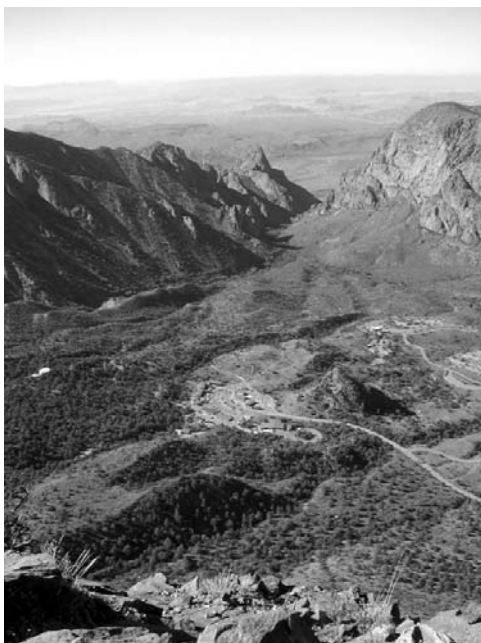


# CONSULTATION & COORDINATION WITH OTHERS

Brian Crockett



Jeff Blaylock



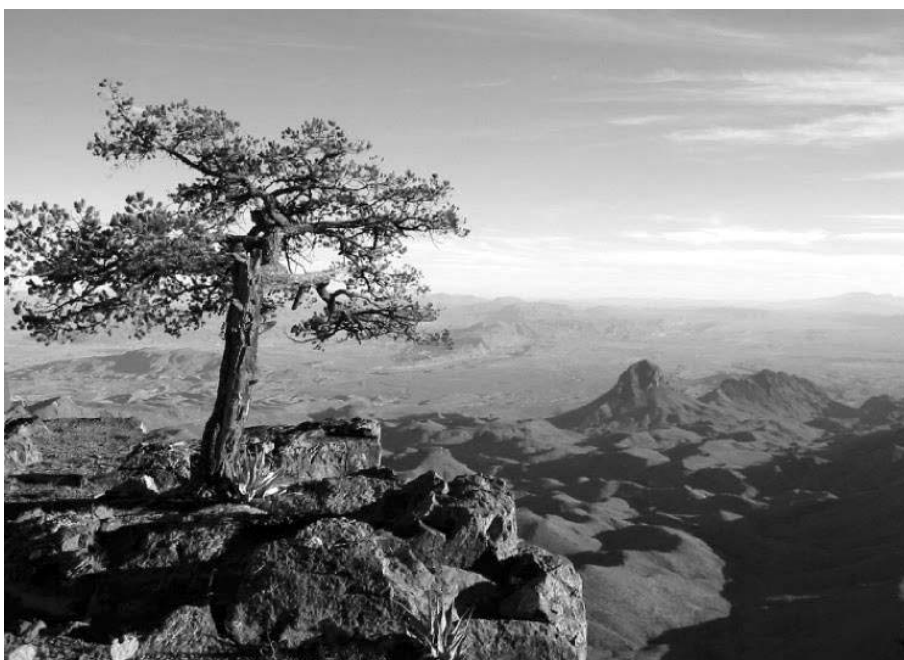
Andy Foster



Jeff Blaylock



Adam Smith





## PUBLIC INVOLVEMENT

The *General Management Plan / Environmental Impact Statement* for Big Bend National Park represents thoughts presented by the National Park Service, Native American groups, and the public. Consultation and coordination among the agencies and the public were vitally important throughout the planning process. The public had two primary avenues by which it participated during the development of the plan: participation in public meetings and responses to newsletters.

### PUBLIC MEETINGS AND NEWSLETTERS

Public meetings and newsletters were used to keep the public informed and involved in the planning process for Big Bend National Park. A mailing list was compiled that consisted of members of governmental agencies, nongovernmental groups, businesses, legislators, local governments, and interested citizens.

The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on May 3, 2000. A newsletter issued in May 2000 described the planning effort. Public meetings were held during May 2000 in Study Butte/Terlingua, Alpine, Sanderson, and Austin and were attended by 63 people. A total of 80 electronic and mailed comments were received in response to that newsletter. The National Park Service also met with city, county, and state agencies. In July 2000 the park held meetings in Mexico at Santa Elena, San Vicente, and Boquillas del Carmen. These meetings were attended by nearly 40 people. The National Park Service received comments in the meetings and in the response to the newsletter, and these comments were incorporated into the issues for the plan.

A second newsletter distributed in June 2001 described the draft alternative concepts for managing the national park. A total of 120 electronic and mailed comments were received in response to that newsletter. A number of letters favored only minimal changes to the current management of the park. Other people

favored more visitor amenities, such as more recreational vehicle camping areas, trails, etc., while others favored removal of park development from areas of the park like the Chisos Basin.

### CONSULTATION

#### Section 106 Consultation

Agencies that have direct or indirect jurisdiction over historic properties are required by section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470, et seq.) to take into account the effect of any undertaking on properties eligible for the National Register of Historic Places. To meet the requirements of 36 CFR 800, the National Park Service sent letters to the Texas historic preservation office and the Advisory Council on Historic Preservation on May 15, 2000, inviting their participation in the planning process. Both offices were sent all the newsletters with a request for comments.

Under the terms of stipulation VI.E of the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, the National Park Service, "in consultation with the SHPO, will make a determination about which are programmatic exclusions under IV.A and B, and all other undertakings, potential effects on those resources to seek review and comment under 36 CFR 800.4-6 during the plan review process."

In the following table the specific undertakings are listed, along with the National Park Service's determination of how those individual undertakings relate to the 1995 Programmatic Agreement.

The Texas historic preservation office concurred that the NPS preferred alternative would not impact known cultural resources. In areas where there may be undiscovered resources or sites with undetermined National Register of

**TABLE 11: ACTIONS THAT MIGHT AFFECT CULTURAL RESOURCES AND ASSOCIATED COMPLIANCE REQUIREMENTS**

(Requirements of the Texas Historic Preservation Office and/or the Advisory Council on Historic Preservation)

Action	Compliance Requirement
Adaptively use Barker Lodge for housing	Further SHPO review may be necessary at the scoping, conceptual, and possibly at the design stage of the project.
Development at Buttrill Spring	No further SHPO review necessary unless it is determined that the spring and its features are eligible for the National Register of Historic Places or it is determined that visitation to the spring would impact archeological resources.
Removal of one NPS employee residence and NPS “bunkhouse”	No further SHPO review necessary.
Construct new visitor center	No further SHPO review unless eligible National Register of Historic Places archeological sites are impacted by construction.
Relocation of campsites at Rio Grande Village and Cottonwood Campground	No further SHPO review unless eligible National Register of Historic Places archeological sites are impacted by construction or sites would impact cultural landscapes.
Construct new storage warehouse at Panther Junction	No further SHPO review unless eligible National Register of Historic Places archeological sites are impacted by construction.
Construct new employee housing at Rio Grande Village, Castolon, and Persimmon Gap	No further SHPO review unless eligible National Register of Historic Places archeological sites are impacted by construction or sites would impact cultural landscapes.
Construct fire bays at Rio Grande Village and Castolon	No further SHPO review unless eligible National Register of Historic Places archeological sites are impacted by construction.
Relocation of Maverick entrance station	No further SHPO review unless eligible National Register of Historic Places archeological sites are impacted by construction.
Rehabilitate visitor center	No further SHPO review necessary unless the building is determined eligible for the National Register of Historic Places or is a part of a cultural landscape. If so, further consultation would be necessary to protect the landscape and the character-defining features.
Identification and evaluation of potentially eligible cultural landscapes and resources.	Further SHPO review and consultation necessary to determine if any of the cultural landscapes or properties are potentially eligible for listing on the National Register of Historic Places.

Historic Places eligibility, the National Park Service has developed a plan that would preserve or avoid cultural resources. The state historic preservation officer has asked to be consulted during any inventory work to determine whether cultural resources are present and to determine their eligibility and any effect.

Blackfeet Tribe  
Caddo Indian Tribe of Oklahoma  
Cheyenne-Arapaho Tribes of Oklahoma  
Jicarilla Apache Tribe  
Kiowa Indian Tribe of Oklahoma  
Comanche Indian Tribe, Oklahoma  
Kickapoo Traditional Tribe of Texas

### Consultation with Native Americans

Letters were sent to the following Native American groups on May 15, 2000, to invite their participation in the planning process:

Fort Sill Apache Tribe of Oklahoma  
Mescalero Apache Tribe  
Apache Tribe of Oklahoma

The tribes were briefed on the scope of the planning project and the preliminary alternatives by newsletter and follow-up telephone calls soliciting comments. Oral comments by some tribes included recommendations to maintain the park as it is; other tribes had no comments at this time. The Mescalero Apache commented that traditional cultural properties be identified and protected and that interpretation takes in the Native American viewpoint. Conversations



have been ongoing throughout the planning process to inform the tribes about the progress of the plan and identify how and to what extent they would like to be involved. The listed tribes

were sent a copy of the draft plan. This was followed by telephone calls to the tribes. There were no comments from the tribes at this time.

## COMMENTS ON THE DRAFT DOCUMENT

This section contains a summary of comments received through public meetings, letters, and e-mails after the *Draft General Management Plan/Environmental Impact Statement* for Big Bend National Park was released on June 11, 2003. The Council on Environmental Quality (CEQ) regulations that implement the National Environmental Policy Act (NEPA) provide guidance on how an agency is to respond to public comments (40 *Code of Federal Regulations*, section 1503.4.1-5).

(a) An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by one or more of the means listed below, stating its response in the final statement. Possible responses are to

- (1) Modify alternatives including the proposed action.
- (2) Develop and evaluate alternatives not previously given serious consideration by the agency.
- (3) Supplement, improve, or modify its analyses.
- (4) Make factual corrections.
- (5) Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

The National Park Service considered all written comments according to the requirements of 40 CFR 1503.

A notice of availability of the draft document was published in the *Federal Register* on June 11, 2003 (*Federal Register* Vol. 68, No. 112). About 750 copies of the draft were distributed to government agencies, organizations, public interest groups, and individuals. In addition, the complete text of the *Draft General Management*

*Plan/ Environmental Impact Statement* was posted on the NPS Web site.

The National Park Service held four public meetings in Dallas, Houston, Alpine, and Study Butte in July 2003. Postcards giving the time and location for each meeting were sent out to the mailing list and to the Friends of Big Bend National Park at their request. There were a total of 91 people at these four meetings. In general, the comments at the public meetings sought clarification of the various alternatives, with some discussion on the pros and cons of each alternative. Many questions centered on retaining or removing the lodging unit in Chisos Basin. Comments were also made concerning how and when the park would receive funding to carry out implementation of the approved alternative.

A total of 75 comment forms, letters, and electronic messages were received from individuals in response to the draft; of these, 18 were form letters. Twenty comment letters were received from governing bodies, government agencies, organizations, and organized interest groups during the comment period. Written comments were accepted through August 29, 2003. All letters from governing bodies, government agencies, and organizations as well as substantive letters from individuals are reproduced on the following pages.

### CHANGES RESULTING FROM COMMENTS

In response to public comments, the National Park Service has decided not to remove the lodge unit from Chisos Basin in its preferred alternative. If a water shortage occurs in the Basin then facilities, concessions, and the NPS campground could be closed on a temporary basis. Also the National Park Service could build additional housing units in Panther Junction to accommodate NPS needs, as well as those of the Border Patrol and the concessioner.

## **RESPONSES TO COMMENTS ON THE DRAFT DOCUMENT**

Following are reproductions of letters from all agencies and letters from all organizations and individuals that had with substantive comments.



OFFICE OF THE COMMISSIONER  
UNITED STATES SECTION

INTERNATIONAL BOUNDARY AND WATER COMMISSION  
UNITED STATES AND MEXICO

JUL 25 2003

2003 JUL 20 PM 2:03  
BIG BEND NATL. PARK,  
TEXAS

Mr. John A. King  
Superintendent  
Big Bend National Park  
P.O. Box 129  
Big Bend National Park, TX 79834-0129

Dear Mr. King:

Thank you for your June 11, 2003 letter ( Reference D18, BIBE-409) and the opportunity to review and comment on the Big Bend National Park Draft General Management Plan/Environmental Impact Statement. The document will guide park administrators and staff in managing natural and cultural resources, visitation, and development for the next 15 to 20 years.

As you are aware, the mission of the International Boundary and Water Commission, United States and Mexico (IBWC), is to apply the rights and obligations which the Governments of the United States and Mexico assumed under numerous boundary and water treaties and related agreements. The United States Section of the IBWC (USIBWC) by virtue of the Treaty of February 3, 1944, (the 1944 Water Treaty) for "Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande" (TS 994; 59 Stat 1219), and agreements concluded thereunder by the United States and Mexico is responsible for ensuring that the United States Government meets the obligations incurred in those agreements.

Implementation of the 1944 Water Treaty requires the IBWC to keep a record of the Rio Grande waters belonging to each country. The IBWC operates and maintains two gaging stations within the Big Bend National Park, on the main channel of the Rio Grande at Johnson Ranch and on the measured tributary Terlingua Creek. Although the Draft General Management Plan does not mention restrictions to the sites above, the USIBWC requires continued access to these stations by established roads within the park.

The Treaty to Resolve Pending Boundary Differences and Maintain the Rio Grande and Colorado River as the International Boundary Between Mexico and the United States, November 23, 1970, (23 U.S.T. 371, T.I.A.S. No. 7313), prohibits the construction of works which may cause deflection or obstruction of the normal flow of the river or its flood flows. The USIBWC requires that proposed construction or tree planting activities be accomplished in a way that does not impede or change flows in the Rio Grande or alter historic surface runoff characteristics at the international border. This requirement is intended to ensure that developments in one country will not cause damage to lands or resources in the other country. Accordingly, the USIBWC will require that engineering drawings and any necessary supporting calculations be submitted for review and approval before beginning work, which show that the proposed activities and construction will not change historic

Response to International Boundary and Water  
Commission Letter

1. Thank you for your review and comment on the *Draft General Management Plan / Environmental Impact Statement*. Additions have been made to the "Purpose of and Need for the Plan," chapter in the "Laws, Policies, and Mandates" section to reflect the IBWC's mission and reaffirm the commitment of staff at Big Bend National Park to work with the commission on issues of concern to the commission.

surface runoff characteristics. The USIBWC will also require assurance that structures constructed along the United States/Mexico border are maintained in an adequate manner and that liability issues created by these structures are addressed.

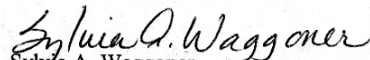
Other more specific comments include: Page 132, Upstream Use of the Rio Grande.

2.

The sentence: "Despite numerous treaties and agreements, both international and among parties in the United States, the water in the Rio Grande is so overused that the riverbed between El Paso and Presidio, Texas is frequently dry (NPS 1997a)." This statement promotes the misconception that the river between El Paso and Presidio, also known as the "Forgotten River Stretch" is always dry. The USIBWC flow records at the Candelaria gaging station from 1977 to the present, indicate an average flow of 7.59 cubic meters per second. However, the data indicates intermittent flows at times between 1977 through 1981. This and other historical flow data is available on the USIBWC website at [www.ibwc.state.gov/wad/histflo1.htm](http://www.ibwc.state.gov/wad/histflo1.htm).

The USIBWC does not anticipate the management strategies discussed in the plan to conflict with the mission of the IBWC. The USIBWC is interested in working with the National Park Service to ensure the preservation of the international boundary along the Rio Grande boundary of Big Bend National Park, and to achieve the desired management goals for the area. Thank you again for the opportunity to review and comment on the Big Bend National Park Draft General Management Plan/Environmental Impact Statement. If you have any questions regarding these comments, please call Environmental Protection Specialist, Daniel Borunda at (915) 832-4701.

Sincerely,

  
Sylvia A. Waggoner  
Division Engineer  
Environmental Management Division

2. The additional information you provided on flows at Candelaria has been added to "Environmental Consequences" chapter under "Methods for Analyzing Impacts," "Upstream of the Rio Grande."



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
10711 Burnet Road, Suite 200  
Austin, Texas 78758  
(512) 490-0057

July 18, 2003

Mary Magee  
U.S. Department of the Interior  
National Park Service, Intermountain Region  
12795 West Alameda Parkway  
P.O. Box 25287  
Denver, Colorado 80225-0287

Consultation # 2-15-2000-I-868

Dear Ms. Magee:

We are responding to your June 11, 2003, letter (received in our office on June 16, 2003) requesting information from the U.S. Fish and Wildlife Service (Service) on federally listed threatened and endangered species and their habitats that may be impacted by activities outlined in the Draft General Management Plan/Environmental Impact Statement (EIS) prepared for Big Bend National Park (Park) in Brewster and Presidio counties, Texas. It is our understanding that this information will be used by the National Park Service (NPS) in preparing a final environmental document in accordance with the National Environmental Policy Act (NEPA) of 1969 for the proposed activities.

It is necessary to prepare a General Management Plan for the Park to address issues such as sustainability of natural resources, degradation of visitor and staff facilities, and water quality and quantity. This plan, once finalized, will serve to guide the Park for the next 15-20 years in its mission to "preserve and protect a representative area of the Chihuahuan Desert along the Rio Grand for the benefit and enjoyment of present and future generations." Three alternatives are presented for managing the Park as described below.

Alternative A, the "No-action or Status Quo" alternative, outlines continuing management of the Park following current strategies. Research and monitoring of resources would continue much as it is now, and no significant upgrades or construction of visitor and staff facilities are anticipated. The water treatment system at Castolon and fire suppression systems at various locations would be upgraded. A 0.5-mile segment of Park Route 12 would be reconstructed to improve safety and line-of-sight.

Alternative B, the "Enhanced and Adequate Natural Resource Stewardship and Enhanced Visitor Facilities" alternative (Preferred alternative), would provide for improved protection of natural resources, enhancement of visitor experience, and upgrades to staff facilities. One NPS employee residence, one bunkhouse, and one 12-room lodge would be removed from Chisos Basin. These

Ms. Magee

2

actions are expected to decrease human consumption from Oak Spring by 13 percent, or 532,000 gallons, thereby improving wildlife habitat. A new visitor center would be constructed at Panther Junction to improve interpretive and safety related visitor services. Water consumption at Rio Grande Village would be decreased by 50 percent to phase out heavy water using plants that are unnatural to the arid environment of the Park. Campsites at Rio Grande Village would be relocated and a new water supply source for human consumption would be found to provide for greater protection of the Big Bend gambusia (*Gambusia gaigei*). The Maverick entrance station would be relocated to a point on the western boundary of the Park to remove it from its current prominent location in the viewshed and improve staff and visitor safety.

Alternative C, the "Maximize Natural Resource Stewardship and Preservation by Providing a More Resource-oriented Visitor Experience" alternative, provides for the greatest protection and preservation of natural resources within the Park. All development at Chisos Basin and Rio Grande Village would be removed, thus encouraging lodging development outside of the Park. Trailheads would be designed in these areas to accommodate visitors in these two areas. The Visitor Center would be rehabilitated at Panther Junction.

### Federally listed species

Big Bend National Park is not located within designated critical habitat of any federally listed threatened or endangered species. An updated list of federally listed threatened and endangered species for Brewster and Presidio counties is enclosed for your reference. It has been determined that the only two listed species that may be impacted by the proposed activities are the black-capped vireo (*Vireo atricapillus*) and the Big Bend gambusia. All other species either do not occur in the park, are not found in areas that will be impacted by proposed activities, or are migratory and are very unlikely to be impacted.

Black-capped vireo habitat has been identified in the Chisos Mountains and is composed of shrubby, dense vegetation adapted to the arid West Texas climate with species such as evergreen sumac, mountain laurel, littleleaf ash, and various cacti dominating the landscape. Currently, vireos that use the Park may be impacted by human disturbance, vegetation removal for trail and road maintenance, natural succession, and brown-headed cowbird (*Molothrus ater*) brood parasitism.

The Big Bend gambusia is only known to occur in the wild at the spring-fed ponds at Rio Grande Village. Habitat alteration, groundwater pumping, and competition with invasive species (such as the western mosquito fish (*Gambusia affinis*)) are the primary threats to this species.

Proposed activities in Alternative B are not anticipated to adversely affect the black-capped vireo or Big Bend gambusia due to the following reasons:

- Removal of building structures at Chisos Basin may have a long-term beneficial effect on the black-capped vireo by the slight reduction of potential human disturbances, but



Ms. Magee

3

is more than likely not significant enough to have a measurable impact on this species. The sites of building removal may be revegetated with plant species that may develop into black-capped vireo habitat, but this too will probably not have a measurable beneficial impact on this species population in the Park due to the close proximity to other lodging facilities.


- Eliminating the groundwater pumping of Big Bend gambusia habitat at Rio Grande Village may have beneficial impacts on this species. We understand that the Park is committed to developing groundwater wells that will use shallow aquifer water, eliminating the current use of the deep, geothermal source that feeds the habitat springs. Additionally, the removal of campsites near the habitat springs and restoration to natural conditions may further reduce potential impacts.

Proposed activities outlined in Alternative B are expected to disturb approximately 10 acres of land in the Park and 2.5 acres of land outside the Park. All of these areas have been previously disturbed and do not currently support habitat for federally listed species. In addition, approximately 62 acres of land will be restored (as much as possible) to natural conditions following removal of structures.

Overall, we believe that proposed actions outlined in Alternative B may produce beneficial, long-term benefits for resources of concern to the Service and NPS. Wetlands, such as Oak Spring and the springs that support the Big Bend gambusia, and associated wildlife would benefit from increased flows. Reduction of irrigation by 50 percent at Rio Grande Village would benefit native plants by reducing competition with the non-native "water hogging" invasive plants that currently inhabit this area of the Park.

We look forward to coordinating with NPS and Park staff on individual projects in the future designed to achieve the goals outlined in this plan, and thank you for your concern for endangered and threatened species and other natural resources. If we can be of further assistance or if you have any questions about these comments, please contact Jana Milliken of our staff at 512- 490-0057, extension 243. Please refer to the Service Consultation # listed above in any future correspondence regarding this project.

Sincerely,



Robert T. Pine  
Supervisor

Enclosure

Federally Listed as Threatened and Endangered Species of Texas  
June 24, 2003

**This list represents species that may be found in counties throughout the Austin Ecological Services office's area of responsibility. Please contact the Austin ES office (U.S. Fish and Wildlife Service, 10711 Burnet Rd., Suite 200, Austin, Texas 78758, 512/490-0057) if additional information is needed. Please contact the appropriate USFWS field office in Arlington, Clear Lake, or Corpus Christi for projects occurring in counties not listed below.**

**DISCLAIMER**

**This County by County list is based on information available to the U.S. Fish and Wildlife Service at the time of preparation, date on page 1. This list is subject to change, without notice, as new biological information is gathered and should not be used as the sole source for identifying species that may be impacted by a project.**

Migratory Species Common to many or all Counties: Species listed specifically in a county have confirmed sightings. If a species is not listed they may occur as migrants in those counties.

Least tern	(E ~)	<i>Sterna antillarum</i>
Whooping crane	(E w/CH)	<i>Grus americana</i>
Bald eagle	(T)	<i>Haliaeetus leucocephalus</i>
Piping plover	(T w/CH)	<i>Charadrius melodus</i>

**Brewster County**

Black-capped vireo	(E)	<i>Vireo atricapillus</i>
Northern aplomado falcon	(E)	<i>Falco femoralis septentrionalis</i>
Southwestern willow flycatcher	(E†)	<i>Empidonax traillii eximius</i>
Whooping crane	(E w/CH)	<i>Grus americana</i>
Mexican long-nosed bat	(E)	<i>Leptonycteris nivalis</i>
Big Bend gambusia	(E)	<i>Gambusia gaigei</i>
Davis' green pitaya	(E)	<i>Echinocereus viridiflorus</i> var. <i>davisii</i> (=E. <i>davisii</i> )
Nellie cory cactus	(E)	<i>Coryphantha</i> (=Escobaria =Mammillaria) <i>minima</i>
Terjunga Creek cats-eye	(E)	<i>Cryptantha crassipes</i>
Bunches cory cactus	(T)	<i>Coryphantha ramillosa</i>
Chisos Mountain hedgehog cactus	(T)	<i>Echinocereus chisoensis</i> (=reichenbachii) var. <i>chisoensis</i>
Hinckley oak	(T)	<i>Quercus hinckleyi</i>
Lloyd's Mariposa cactus	(T)	<i>Sclerocactus</i> (=Echinomastus=Echinocactus) <i>mariposensis</i>
Mountain plover	(P/T)	<i>Charadrius montanus</i>
Black-tailed prairie dog	(C)	<i>Cynomys ludovicianus</i>
Texas hornshell (clam)	(C)	<i>Popenaia popei</i>
Guadalupe fescue	(C)	<i>Festuca ligulata</i>
Yellow-billed cuckoo	(C)	<i>Coccyzus americanus</i>

**Presidio County**

Northern aplomado falcon	(E)	<i>Falco femoralis septentrionalis</i>
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Mexican long-nosed bat	(E)	<i>Leptonycteris nivalis</i>
Southwestern willow flycatcher	(E†)	<i>Empidonax traillii extimus</i>
Hinckley oak	(T)	<i>Quercus hinckleyi</i>
Lloyd's Mariposa cactus	(T)	<i>Sclerocactus (=Echinomastus=Echinocactus) mariposensis</i>
Black-tailed prairie dog	(C)	<i>Cynomys ludovicianus</i>
Yellow-billed cuckoo	(C)	<i>Coccyzus americanus</i>

## INDEX

Statewide or areawide migrants are not included by county, except where they breed or occur in concentrations. The whooping crane is an exception; an attempt is made to include all confirmed sightings on this list.

E	=	Species in danger of extinction throughout all or a significant portion of its range.
T	=	Species which is likely to become endangered within the foreseeable future throughout all or a significant portion of its range.
C	=	Species for which the Service has on file enough substantial information to warrant listing as threatened or endangered. These species currently have no legal protection. However, addressing these species at this stage could better provide for overall ecosystem health in the local area and may avert potential future listing.
CH	=	Critical Habitat (in Texas unless annotated †)
P/	=	Proposed ...
P/E	=	Species proposed to be listed as endangered.
P/T	=	Species proposed to be listed as threatened.
TSA	=	Threatened due to similarity of appearance. Protections of the Act, such as consultation requirements for Federal agencies under section 7, and recovery planning provisions under section 4(f), do not apply to species listed under similarity of appearance provisions.
□	=	with special rule
†	=	CH designated (or proposed) outside Texas
~	=	protection restricted to populations found in the "interior" of the United States. In Texas, the least tern receives full protection, except within 50 miles (80 km) of the Gulf Coast.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

AUG 05 2003

2003 AUG 11 PM 10:50  
BIG BEND NATL. PARK,  
TEXAS

Superintendent

P. O. Box 129

Big Bend National Park, TX 79834-0129

RE: General Management Plan/Environmental Impact Statement

Dear Superintendent:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the General Management Plan/Environmental Impact Statement for Big Bend National Park.

We have included the results of our Geographic Information System-based Screening Tool (GISST). The GISST is a screening level assessment tool only and does not replace the need for field investigations, it merely points out what could exist in the project area. The GISST uses GIS coverages and Hydrologic Unit Codes (HUC) for watersheds, then uses a decision structure to score criteria for a wide variety of concerns. The scores for each criterion range from 1, lowest environmental concern, to 5, highest potential concern or vulnerability. This scoring system is performed with a 2 mile buffer around the project and at 0.5 mile around the project. These 2 buffers should give you a sense of direct effects (0.5 mile buffer) and indirect effects (2 mile buffer) of the project. Information concerning the GISST criteria can be sent upon request.

EPA rates the DEIS as "LO," i.e., "lack of objections." Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act to inform the public of our views on proposed Federal actions. If you have any questions, please contact Dr. Sharon L. Osowski of my staff at 214-665-7506 for assistance.

EPA appreciates the opportunity to review the DEIS. Please send our office five copies of the FEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460.

Sincerely yours,

Hector B. Pena, Acting Chief  
Office of Planning and Coordination

Enclosures

## GIS SCREENING TOOL (GISST) HELP SHEET

For details on databases, references, or specific criteria used, an electronic file or hardcopy of the GISST User's guide can be sent upon request. Other screening-level projects, including the Environmental Justice Index, can be found at [www.epa.gov/earth1/r6/6en/xp/enxp4a.htm](http://www.epa.gov/earth1/r6/6en/xp/enxp4a.htm)

### The enclosed GISST printout includes the following descriptions:

Column 1: Unique factor/criterion identifier.

Columns 2-6: Criterion values/scores

Column 7: Criteria descriptions

Rows 1-8: Location information

Rows 9-21: Brewster County and subwatershed level criteria

Rows 22-45: Environmental vulnerability criteria for 2 miles around location project

Rows 46-70: Socio-economic criteria for 2 miles around project

Rows 71-80: Toxicity criteria for 2 miles around project

Rows 81-104: Environmental vulnerability criteria for 0.5 miles around location project

Rows 105-129: Socio-economic criteria for 0.5 miles around project

Rows 130-139: Toxicity criteria for 0.5 miles around project

### Other information:

Many of the criterion identifiers are paired; 1) one identifier for the actual value as determined by GIS and 2) one identifier for the score that the value received under the GISST scoring system. For example, Row 10 shows the surface water use identifier (SURWTRUSE) and if it showed that 100% of streams are meeting their designated use within this particular subwatershed (based on the USGS HUC system). One interpretation of this hypothetical example is that all of streams (100%) in this subwatershed are meeting their designated use under Clean Water Act Section 303d. The identifier SURWTRUSEs (Row 11) shows the score or ranking of this surface water use value under GISST. In this hypothetical example, surface water use would score the highest value, 1, indicating a low level of vulnerability and concern to EPA. Criteria are ranked using a 1 to 5 scale, with 1 representing low concern and 5 representing high concern. Scores of "4" or "5" are highlighted on the enclosed table and should be investigated further.

Socioeconomic criteria can be used as a starting point to assess environmental justice issues and to prepare communications strategies for scoping meetings or public meetings. Toxicity criteria can be used as a starting point to determine whether pollution sources may impact the proposed project site. Environmental criteria can be used as a starting point to determine and prioritize traditional "NEPA" issues.

The following scored "high" for the proposed site and should be further investigated:

- Average surface/stream flow. All 5 areas may have low surface water or stream flow or EPA has no data for these areas. The less average stream flow the greater the concern for contaminant loading in a water body. This criteria is evaluated

with data addressing the potential for pollutants being released to streams (see toxicity criteria).

- Distance to Surface Water. Panther Junction is approximately 900-300 feet from a water source. The closer a project is to a water source the more likely the chance for non-point source contamination.
- Surface water quantity (2 and 0.5 mile buffers). This criterion indicated that there is a high proportion of stream or shoreline miles per square mile in both the 2 mile and 0.5 mile buffers around Rio Grande Village and/or Panther Junction. A well developed shoreline (i.e., high score) provides more habitat areas for fish, photosynthesis, and other ecological services.
- Percent Wildlife habitat (2 and 0.5 mile buffers). Using land cover GIS coverages, there is a high percentage of habitat that could potentially be used by wildlife (wetlands, rangelands, forest lands, woodlands, and/or bottomlands). This is to be expected for these locations. These potentially impacted areas may be opportunities for mitigation.
- Land Use ranking (2 and 4 mile buffers). Each land use type in the GIS coverage is judged as to wildlife habitat quality. A score of "5" indicates wildlife habitat defined as rangeland, wetlands, forest lands, woodlands, herbaceous uplands, shrublands, open water may be impacted by the proposed project.. These land cover types are expected for these locations.
- Toxicity criteria (2 and 0.5 mile buffers). Although none of these criteria scored "high", they do not reflect whether pesticides or other hazardous materials are used routinely and stored in an appropriate manner.

**NOTE:** GISST is a screening-level analysis only and is not a substitute for field investigations or ground verification of existing data.



COUNTY	BREWSTER	BREWSTER	BREWSTER	BREWSTER	BREWSTER	County Name
NAME	CHISOS BASIN	RIO GRANDE VILLAGE	PANTHER JUNCTION	CASTOLON	HARTE RANCH	Site Name
LONGD	-103	-102	-103	-103	-103	Longitude - Degrees (listed as 0 if polygon or line are used)
LONGM	18	57	12	30	14	Longitude - Minutes (listed as 0 if polygon or line are used)
LONGS	10	39	18	51	24	Longitude - Seconds (listed as 0 if polygon or line are used)
LATD	29	29	29	29	29	Latitude - Degrees (listed as 0 if polygon or line are used)
LATM	16	10	19	7	32	Latitude - Minutes (listed as 0 if polygon or line are used)
LATS	35	57	42	59	59	Latitude - Seconds (listed as 0 if polygon or line are used)
<b>HUC/County Level Criteria</b>						
SURWTRUSE	0.0	0.0	0.0	0.0	0.0	1.1 Surface Water Use (% streams meeting their designated use)
SURWTRUSES	3	3	3	3	3	1.1 1-5 Score for Surface Water Use
STORET	0	0	0	0	0	1.2 Water Quality (STORET Exceedances per square mile)
STORETSC	1	1	1	1	1	1.2 Score (1-5) for Water Quality
RAINFALL	15.9	15.1	15.1	15.1	14.8	1.3 Annual Average Rainfall (inches per year)
RAINSC	2	2	2	2	2	1.3 Score (1-5) for rainfall
UWASC	1	1	1	1	1	1.15 Unified Watershed Assessment (State Priorities)
AVGFLW	0.0	0.0	0.0	0.0	0.0	1.16 Average surface water flow (cubic feet per second)
AVGFLWSC	5	5	5	5	5	1.16 Score (1-5) for average flow
AQGEOSC	3	3	3	3	3	1.17 Average aquifer geology score
DSWTRSC	4	4	3	2	3	1.7 Score for the Distance to surface water
NONATTSC	1	1	1	1	1	1.13 Ozone nonattainment score by county
SSAQUISC	1	1	1	1	1	1.18 Sole Source Aquifer Score
<b>2 Mile Vulnerability Criteria</b>						
SWTRQ4	0.88	0.96	1.67	0.96	0.78	1.5 Surface water quantity (stream/shoreline miles per sq mile)
SWTRQ4SC	1	2	4	2	1	1.5 Score for surface water quantity
SWTR4	0.0	0.1	0.0	0.0	0.0	1.5' Percent of area that is surface water
SWTR4SC	1	1	1	1	1	1.5' Score for percent surface water
SOILPERM4	3.8	3.0	2.3	2.4	2.9	1.6 Average Soil Permeability Score
GWTRP4	1.0	1.0	1.0	1.0	1.0	1.8 Average Ground water probability score
WLDLFHPER4	99.7	53.3	99.3	70.9	99.8	1.10 Percent wildlife habitat
WLDLFHPER4SC	5	5	5	5	5	1.10 Score for percent wildlife habitat
WLDLFHLUR4	5.0	2.7	5.0	3.6	5.0	1.11 Land Use/Land Cover average ranking
WLDLFHLUR4SC	5	3	5	4	5	1.11 Score for Land Use/Land Cover ranking
AGLANDPER4	0.0	0.1	0.0	1.6	0.0	Percent Agricultural Land
AGLANDPER4SC	1	1	1	1	1	Score for Percent Agricultural Land
WETLANDPER	0.1	0.0	0.0	0.0	0.0	Percent Wetland
WETLANDPERSC	1	1	1	1	1	Score for Percent Wetland
FLOOD1004	N/A	N/A	N/A	N/A	N/A	Percent within 100 year flood plain
FLOOD1004SC	0	0	0	0	0	Score for 100 year flood plain
FLOOD5004	N/A	N/A	N/A	N/A	N/A	Percent within 500 year flood plain
FLOOD5004SC	0	0	0	0	0	Score for 500 year flood plain

RDDENS4	0.5	1.0	1.2	1.0	0.9	1.14 Road density (road mile per sq mile)
RDDENS4SC	1	1	1	1	1	1.14 Score for road density
WTCHAN4	0.0	0.0	0.0	0.0	0.0	1.19 Channelization (channel/canal miles per square mile)
WTCHAN4SC	1	1	1	1	1	1.19 Score for channelization
OTHERFAC4	0	0	0	0	0	1.24 Number of other sites around the facility
OTHERFAC4S	1	1	1	1	1	1.24 Score for number of other sites.
<b>2 Mile Socio-Economic Criteria</b>						
NOHSDGR4	20.0%	0.0%	25.0%	50.0%	20.0%	2.1 Percent of Population without a High School Degree
NOHSDGR4SC	1	1	1	4	1	2.1 Score for population without high school
EDUCSC4	2.6	1.2	2.6	1.7	2.6	2.2 Educational Achievement Score
ECOSTRS4	33.3%	0.0%	0.0%	0.0%	33.3%	2.4 Percent of households that are economically stressed
ECOSTRS4SC	2	1	1	1	2	2.4 Score for economically stressed
MNRTY4	42.9%	50.0%	20.0%	33.3%	16.7%	2.5 Percent of population that is considered a minority
MNRTY4SC	2	2	1	1	1	2.5 Score for minority population
KIDS74	14.3%	0.0%	0.0%	0.0%	0.0%	2.7 Percent of population that is under 7 years of age
KIDS74SC	2	1	1	1	1	2.7 Score for children
OLD554	28.6%	50.0%	20.0%	33.3%	16.7%	2.8 Percent of population that is over 55 years of age
OLD554SC	1	1	1	1	1	2.8 Score for older population
NATAL4	0.0%	0.0%	0.0%	0.0%	0.0%	2.9 Percent of population that is under 1 year of age (surrogate for natality)
NATAL4SC	1	1	1	1	1	2.9 Score for natality
UNMPY4	0.0%	0.0%	0.0%	0.0%	0.0%	2.10 Percent of population over 16 that is unemployed
UNMPY4SC	1	1	1	1	1	2.10 Score for unemployed
PPDNS4	0.6	0.2	0.4	0.2	0.5	2.12 Population density (persons per square mile)
PPDNS4SC	1	1	1	1	1	2.12 Population density Score
TOTPOP4	7	2	5	3	6	2.13 Total Population
LOWENGL4	0.0%	0.0%	0.0%	0.0%	0.0%	2.16 Percent of population over 5 that speaks english not well or not at all
LOWENGL4SC	1	1	1	1	1	2.16 Score for English ability
LINGISOL4	0.0%	0.0%	0.0%	0.0%	0.0%	2.17 Percent of households that are linguistically isolated
LINGISOL4SC	1	1	1	1	1	2.17 Score for linguistically isolated
FRGNBORN4	14.3%	0.0%	0.0%	0.0%	0.0%	2.18 Percent of population that is foreign born
FRGNBORN4SC	3	1	1	1	1	2.18 Score for foreign born
HOUSEAGE4	2.4	1.1	2.3	1.6	2.2	2.19 Score for Age of houses
<b>2 Mile Toxicity Criteria</b>						
LBSAIR4	0	0	0	0	0	3.7 Cumulative chemical releases to air from the TRI
LBSAIRSC4	1	1	1	1	1	3.7 Score for releases to air
LBSWTR4	0	0	0	0	0	1.4 Cumulative chemical releases to water from the TRI
LBSWTRSC4	1	1	1	1	1	1.4 Score for releases to water
LBSLAND4	0	0	0	0	0	3.9 Cumulative chemical releases to land from the TRI
LBSLANDSC4	1	1	1	1	1	3.9 Score for releases to land
DIAIR4	0	0	0	0	0	3.13 Toxicity weighted releases to air
DIAIRSC4	1	1	1	1	1	3.13 Score for toxicity weighted releases to air
DIWTR	0	0	0	0	0	3.12 Toxicity weighted releases to water
DIWTRSC4	1	1	1	1	1	3.12 Score for toxicity weighted releases to water



Half Mile Vulnerability Criteria						
SWTRQ2	1.32	1.54	2.04	0.00	0.50	1.5 Surface water quantity (stream/shoreline miles per sq mile)
SWTRQ2SC	3	4	5	1	1	1.5 Score for surface water quantity
SWTR2	0.0	0.4	0.0	0.0	0.0	1.5' Percent of area that is surface water
SWTR2SC	1	1	1	1	1	1.5' Score for percent surface water
SOILPERM2	4.0	3.0	2.1	2.0	3.0	1.6 Average Soil Permeability Score
GWTRP2	1.0	1.0	1.0	1.0	1.0	1.8 Average Ground water probability score
WLDLFHPER2	99.8	90.2	97.7	94.9	100.0	1.10 Percent wildlife habitat
WLDLFHPER2SC	5	5	5	5	5	1.10 Score for percent wildlife habitat
WLDLFHLUR2	5.0	4.6	4.9	4.9	5.0	1.11 Land Use/Land Cover average ranking
WLDLFHLUR2SC	5	5	5	5	5	1.11 Score for Land Use/Land Cover ranking
AGLANDPER2	0.0	0.1	0.0	3.5	0.0	Percent Agricultural Land
AGLANDPER2SC	1	1	1	1	1	Score for Percent Agricultural Land
WETLANDPER	0.0	0.0	0.0	0.0	0.0	Percent Wetland
WETLANDPERSC	1	1	1	1	1	Score for Percent Wetland
FLOOD1002	N/A	N/A	N/A	N/A	N/A	Percent within 100 year flood plain
FLOOD1002SC	0	0	0	0	0	Score for 100 year flood plain
FLOOD5002	N/A	N/A	N/A	N/A	N/A	Percent within 500 year flood plain
FLOOD5002SC	0	0	0	0	0	Score for 500 year flood plain
RDDENS2	4.0	4.7	4.3	3.1	0.0	1.14 Road density (road mile per sq mile)
RDDENS2SC	5	5	5	5	1	1.14 Score for road density
WTCHAN2	0.00	0.00	0.00	0.00	0.00	1.19 Channelization (channel/canal miles per square mile)
WTCHAN2SC	1	1	1	1	1	1.19 Score for channelization
OTHERFAC2	0	0	0	0	0	1.24 Number of other sites around the facility
OTHERFAC2SC	1	1	1	1	1	1.24 Score for number of other sites.
Half Mile Socio-Economic Criteria						
NOHSDEGR2	0.0%	0.0%	0.0%	0.0%	0.0%	2.1 Percent of Population without a High School Degree
NOHSDEGR2SC	1	1	1	1	1	2.1 Score for population without high school
EDUCSC2	0.0	0.0	0.0	0.0	0.0	2.2 Educational Achievement Score
ECOSTRS2	0.0%	0.0%	0.0%	0.0%	0.0%	2.4 Percent of households that are economically stressed
ECOSTRS2SC	1	1	1	1	1	2.4 Score for economically stressed
MNRTY2	0.0%	0.0%	0.0%	0.0%	0.0%	2.5 Percent of population that is considered a minority
MNRTY2SC	1	1	1	1	1	2.5 Score for minority population
KIDS72	0.0%	0.0%	0.0%	0.0%	0.0%	2.7 Percent of population that is under 7 years of age
KIDS72SC	1	1	1	1	1	2.7 Score for children
OLD552	0.0%	0.0%	0.0%	0.0%	0.0%	2.8 Percent of population that is over 55 years of age
OLD552SC	1	1	1	1	1	2.8 Score for older population
NATAL2	0.0%	0.0%	0.0%	0.0%	0.0%	% population that is under 1 year of age (surrogate for natality)
NATAL2SC	1	1	1	1	1	2.9 Score for natality
UNMPY2	0.0%	0.0%	0.0%	0.0%	0.0%	2.10 Percent of population over 16 that is unemployed
UNMPY2SC	1	1	1	1	1	2.10 Score for unemployed
PPDNS2	0.0	0.0	0.0	0.0	0.0	2.12 Population density (persons per square mile)
PPDNS2SC	1	1	1	1	1	2.12 Population density Score

TOTPOP2	-	-	-	-	-	2.13 Total Population
LOWENGL2	0.0%	0.0%	0.0%	0.0%	0.0%	% population over 5 that speaks english not well or not at all
LOWENGL2SC	1	1	1	1	1	2.16 Score for English ability
LINGISOL2	0.0%	0.0%	0.0%	0.0%	0.0%	2.17 Percent of households that are linguistically isolated
LINGISOL2SC	1	1	1	1	1	2.17 Score for linguistically isolated
FRGNBORN2	0.0%	0.0%	0.0%	0.0%	0.0%	2.18 Percent of population that is foreign born
FRGNBORN2SC	1	1	1	1	1	2.18 Score for foreign born
HOUSEAGE2	0.0	0.0	0.0	0.0	0.0	2.19 Score for Age of houses
Half Mile Toxicity Criteria						
LBSAIR2	0	0	0	0	0	3.7 Cumulative chemical releases to air from the TRI
LBSAIRSC2	1	1	1	1	1	3.7 Score for releases to air
LBSWTR2	0	0	0	0	0	1.4 Cumulative chemical releases to water from the TRI
LBSWTRSC2	1	1	1	1	1	1.4 Score for releases to water
LBSLAND2	0	0	0	0	0	3.9 Cumulative chemical releases to land from the TRI
LBSLANDSC2	1	1	1	1	1	3.9 Score for releases to land
DIAIR2	0	0	0	0	0	3.13 Toxicity weighted releases to air
DIAIRSC2	1	1	1	1	1	3.13 Score for toxicity weighted releases to air
DIWTR2	0	0	0	0	0	3.12 Toxicity weighted releases to water
DIWTRSC2	1	1	1	1	1	3.12 Score for toxicity weighted releases to water





TEXAS  
HISTORICAL  
COMMISSION

The State Agency for Historic Preservation

RICK PERRY, GOVERNOR  
JOHN L. NAU, III, CHAIRMAN  
F. LAWRENCE OAKS, EXECUTIVE DIRECTOR

30 July 2003

John H. King  
Superintendent  
Big Bend National Park  
Rio Grande Wild and Scenic River  
P.O. Box 129  
Big Bend National Park, Texas 79834-0129

Re: Project review under Section 106 of the National Historic Preservation Act of 1966,  
Draft: *Big Bend National Park, General Management Plan/Environmental Impact Statement*, Brewster County, Texas (NPS)

Dear Mr. King:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Debra L. Beene, has completed its review. We concur that the preferred alternative, Alternate B, results in enhanced visitor experience and provides protection of park resources. The development would not impact known cultural resources; and in areas where there may be undiscovered resources or sites with undetermined National Register of Historic Places eligibility, avoidance and preservation are planned. SHPO should be consulted during inventory to determine whether cultural resources are present and to determine eligibility and effect.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Debra L. Beene at 512/463-5865.**

Sincerely,

*William A. Mast*  
for

F. Lawrence Oaks, State Historic Preservation Officer

cc: Tom Alex, BBNP Archaeologist  
Peter Ketter, Pam Opiela, THC

FLO/dlb



August 20, 2003

John H. King, Superintendent  
Big Bend National Park  
Rio Grande Wild and Scenic River  
P.O. Box 129  
Big Bend National Park, TX 79834-0129

RE: Draft General Management Plan/Environmental Impact Statement for Big Bend National Park, Brewster County

Dear Mr. King:

Thank you for coordinating with this agency regarding the General Management Plan for Big Bend National Park. Texas Parks and Wildlife Department (TPWD) staff has reviewed the proposed plan and offer the following comments.

The preferred alternative of the management plan would entail the construction of a new visitors center that would include an auditorium, an expanded exhibit area, and an outdoor exhibit area. The plan would also enable the development of interpretive opportunities for the Buttrill Spring area. In an effort to reduce the water demand at Rio Grande Village, the plan proposes the reduction of irrigation water used at Rio Grande Village by 50% by phasing out plants that are heavy water users at the Village and at Cottonwood Campground, relocating personnel to gateway communities, and removing some development from Chisos Basin.

Because project activities would provide long term benefits to fish and wildlife habitats within Big Bend National Park, any potential short term impacts resulting from restoration or enhancement activities would be negligible. TPWD supports the proposed management plan and looks forward to working with the National Park Service in the future. I apologize for the lateness of our reply. Please call me at (512) 389-4579 if we may be of further assistance.

Sincerely,



Take a kid  
hunting or fishing  
\*\*\*  
Visit a state park  
or historic site

*Danny Allen*  
Danny Allen  
Wildlife Habitat Assessment Program  
Wildlife Division

DLA:dg.9930

Received  
SEP 12 21  
DSC-PSI

AUG 25 2003



## BREWSTER COUNTY COMMISSIONERS COURT

Asa Stone, Commissioner, Pct. 1

Emilio Salmon, Commissioner, Pct. 3

Val Beard, County Judge

J.W. Pattillo, Commissioner, Pct. 2

Matilde Pallanaz, Commissioner, Pct. 4

July 22, 2003

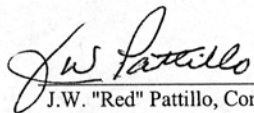
John King, Superintendent  
Big Bend National Park  
P.O. Box 129  
Big Bend National Park, TX. 79834-0129

Dear Superintendent King:

Brewster County Commissioners Court strongly advocates that all existing visitor housing in Big Bend National Park's Chisos Basin be both preserved and continue to operate as motel units for overnight guests. Tearing down twelve units of the Chisos Mountain Lodge would accomplish absolutely nothing positive, and would, in fact, diminish access to the Big Bend National Park by limiting the number of guests who could overnight in the Basin. This would negatively impact both the Park and our County. Finally, we remind the National Park Service that Big Bend National Park was explicitly established for recreational purposes. As such, visitor facilities should be expanded and not diminished.



Asa "Cookie" Stone, Commissioner, Pct. 1



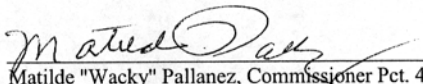
J.W. "Red" Pattillo, Commissioner Pct. 2



Val Clark Beard, County Judge



Emilio Salmon, Commissioner Pct. 3



Matilde "Wacky" Pallanaz, Commissioner Pct. 4



## BREWSTER COUNTY HISTORICAL COMMISSION

J. TRAVIS ROBERTS, JR., P.E., R.P.L.S., Chairman

P.O. BOX 455, POST ROAD  
MARATHON, TEXAS 79842

Ranch Home Phone / Fax (432) 386-4458

6537 PATRICK DRIVE  
DALLAS, TEXAS 75214

Home / Fax (214) 828-0212

Email [JTRJ37@AOL.COM](mailto:JTRJ37@AOL.COM)

August 27, 2003

Mr. John King, Superintendent  
National Park Service  
Big Bend National Park  
P.O. Box 129  
Big Bend National Park, TX 79834-0129

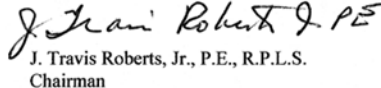
RE: General Management Plan  
Big Bend National Park

Dear Mr. King:

Attached is a Resolution approved by the Brewster County Historical Commission in support of Plan "B" with modifications. Please consider this and the preparation of a final document outlining the management practices for the park.

Your able direction and attention to details is greatly appreciated. If there elements that we can be of assistance, please call on us.

Sincerely,  
BREWSTER COUNTY HISTORICAL COMMISSION



J. Travis Roberts, Jr., P.E., R.P.L.S.  
Chairman

Enclosures

cc: Honorable Val Beard, County Judge

**RESOLUTION  
BREWSTER COUNTY HISTORICAL COMMISSION  
BREWSTER COUNTY  
ALPINE, TEXAS**

**WHEREAS,** The Brewster County Historical Commission is appointed by the County Commissioners Court by authority established by the State of Texas to operate and function for the preservation, review and protection of cultural and historical items, structures, locations and local interest materials within the County, for the general public, and

**WHEREAS,** The historical interest of the area is importation and critical to maintain the public awareness for the future preservation of historical records, structures, places, locations, events, and item that relate to the use and benefits of the people, and

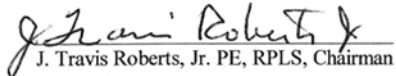
**WHEREAS,** The Big Bend National Park is an operating unit located within Brewster County, established by the United States Government for the protection of the existing environment, the land, the geological and special historical nature of the area, for the use and enjoyment of the exiting and future generations of people who desire to observe, witness and visit the facilities that exist or may exist, and

**WHEREAS,** The proposed Master Plan for General Management and Environmental Controls as now being considered provides an outline for three Plans, i.e., Plan A, Plan B, and Plan C, all of which are identified as possible approaches for consideration and adoption for the future direction of management of the park system, and the access of facilities by the visitors for a one day or extended visit to witness the beauty of the vast expanse of mountains, vegetation, wildlife and historical elements used and established by people of our past, including but not limited to the early native Americans of several groups, the early Spanish missions, the early military expeditions and mapping of the area, the mining and ranching activities that were established by the settlers and the efforts of the CCC troops assigned to build facilities for the people to use and enjoy, and

**WHEREAS,** We will support the proposed **Plan B with modifications**, that the existing facilities are not destroyed, tore down or removed, that added visitor centers should be constructed in central locations not determinable to the area, that new and better facilities should be made available for the Ranger Staff, and that the Big Bend National Park should continue to be maintained for all the people, not just a select few, and

**NOW THEREFORE,** Be it known that the Brewster County Historical Commission does support the **Plan B with modifications**, and that the modifications of Plan B must be written and identified for the review and public comments prior to final adoption.

**APPROVED BY THE COMMISSION,** This 21 th day of August 2003

  
J. Travis Roberts, Jr. PE, RPLS, Chairman

MAYOR  
MICKEY CLOUSE

COUNCILMAN WARD 1  
FRANK YAKUBANSKI

COUNCILMAN WARD 2  
KACHOO VALENZUELA

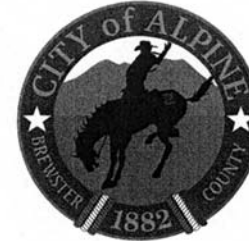
COUNCILMAN WARD 3  
GERALD RAUN

COUNCILMAN WARD 4  
JOE PORTILLO

COUNCILMAN WARD 5  
FRANK CARGO

CITY MANAGER  
BILL LEWIS

CITY SECRETARY  
ANNABEL M. HOLGUIN



NATIONAL PARK SERVICE  
2003 AUG -1 PM 2:00  
BIG BEND NATL. PARK,  
TEXAS

A MAIN STREET CITY

100 NORTH 13<sup>TH</sup> (915) 837-3301 FAX (915) 837-2044 website ci.alpine.tx.us

July 29, 2003

In reply to: General Management Plan

Mr. John H. King  
Superintendent Big Bend National Park  
P.O. Box 129  
Big Bend National Park, Texas 79834

Dear John:

The City of Alpine recognizes the impact that Big Bend National Park brings to our area.

Promoting tourism in the area is very important and Big Bend National Park is a top attraction.

We would like to commend you on the maintenance and beauty of the park. I had the pleasure of visiting there last month and I have never seen the park so beautiful.

We realize that from time to time adjustment and alternatives have to be made that are not in the best interest of all concerned. In keeping with the alternatives that you outline in your study it looks as if alternative number 2 is a better plan.

We also hope you can find a way to save the twelve structures at the Chisos Basin. There never seems to be enough lodging in peak times at the park and it would be a loss of revenue to turn away customers. Since the units are already there, just keeping them maintained and if needed they can be put into service.

Thank you for the opportunity to express our opinion and we wish you the best in your General Management Plan.

Sincerely,

Mickey Clouse  
Mayor, City of Alpine

RESOLUTION NO. 03-114R

SUPPORTING & ENDORSING BIG BEND NATIONAL PARK'S  
MASTER PLAN

**WHEREAS**, the City of Fort Stockton is fully supportive of all the efforts the Big Bend National Park is doing in preserving & maintaining all of its resources for future generations;

**WHEREAS**, the City of Fort Stockton is recognizing that Tourism is one of our largest industries in Texas & that it is very important to the West Texas Area & especially to the Big Bend Area;

**WHEREAS**, the City of Fort Stockton is supporting the efforts of the Brewster County Tourism group in its efforts to promote & help preserve the future of the Big Bend;

**WHEREAS**, the City of Fort Stockton is in full support of Big Bend National Park's Master Plan;

**WHEREAS**, the City of Fort Stockton is supporting Alternative B of the proposed Master Plan with modifications to allow the existence of the Concession Lodge & its facilities as they presently exist & allowing a new Visitor's Center at Panther Junction;

**WHEREAS**, the City of Fort Stockton is aware of the importance that tourism plays in our economy & we must do everything to preserve such an important industry;

**THEREFORE**, the City of Fort Stockton recognizes the efforts of the National Park Service to protect the environment, we do support any efforts to conserve & protect the resources that the Big Bend has to offer with Alternative B Concept of its proposed Master Plan.

Signed this 29<sup>th</sup> Day of August, 2003

  
TONY VILLARREAL, Mayor

ATTEST:

  
DELMA A. GONZALEZ, City Secretary

RESOLUTION  
PECOS COUNTY HISTORICAL COMMISSION  
PECOS COUNTY  
FORT STOCKTON, TEXAS

Received

SEP 12 2003

DSC-PSD

**WHEREAS**, The Pecos County Historical Commission is appointed by the County Commissioners Court by authority established by the State of Texas to operate and function for the preservation, review and protection of cultural and historical items, structures, locations and local interest materials within the County, for the general public, and

**WHEREAS**, The historical interest of the area is importation and critical to maintain the public awareness for the future preservation of historical records, structures, places, locations, events, and item that relate to the use and benefits of the people, and

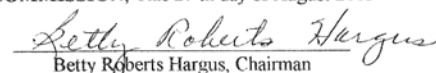
**WHEREAS**, The Big Bend National Park is an operating unit located within Brewster County which joins Pecos County to the South, established by the United States Government for the protection of the existing environment, the land, the geological and special historical nature of the area, for the use and enjoyment of the exiting and future generations of people who desire to observe, witness and visit the facilities that exist or may exist, and

**WHEREAS**, The proposed Master Plan for General Management and Environmental Controls as now being considered provides an outline for three Plans, i.e., Plan A, Plan B, and Plan C, all of which are identified as possible approaches for consideration and adoption for the future direction of management of the park system, and the access of facilities by the visitors for a one day or extended visit to witness the beauty of the vast expanse of mountains, vegetation, wildlife and historical elements used and established by people of our past, including but not limited to the early native Americans of several groups, the early Spanish missions, the early military expeditions and mapping of the area, the mining and ranching activities that were established by the settlers and the efforts of the CCC troops assigned to build facilities for the people to use and enjoy, and

**WHEREAS**, We will support the proposed **Plan B with modifications**, that the existing facilities are not destroyed, tore down or removed, that added visitor centers should be constructed in central locations not determinable to the area, that new and better facilities should be made available for the Ranger Staff, and that the Big Bend National Park should continue to be maintained for all the people, not just a select few, and

**NOW THEREFORE**, Be it known that the Pecos County Historical Commission does support the **Plan B with modifications**, and that the modifications of Plan B must be written and identified for the review and public comments prior to final adoption.

**APPROVED BY THE COMMISSION**, This 27 th day of August 2003

  
Betty Roberts Hargus, Chairman





August 13, 2003

Received

SEP 12 2003

DSC-PSD

Mr. John H. King, Jr.  
Superintendent  
Big Bend National Park  
P.O. Box 129  
Big Bend National Park, Texas 79834

Dear John:

Forever Resorts appreciates the opportunity to provide its comments on the Big Bend National Park Draft General Management Plan/Environmental Impact Statement.

We agree that perhaps the March, 1980 General Management Plan should be revisited and updated to provide guidance for the future direction Big Bend National Park should go to best manage the resource, but still provide desired services to the park visitor.

We feel that the 1979 Environmental Impact Statement should be considered and noted in the bibliography as being used by the planning team. That document provides the historical perspective on protection and development of visitor services and park management for the last 24 years.

1. Although facilities have been developed outside the park in the ensuing years, the total park visitation, since peaking at 378,600 in 1976, has remained relatively stable. Unlike some parks, Big Bend has not experienced the increases shown elsewhere. It appears however, that the 1993 adjustment of the multipliers for "Recreation Visits" to 2.9 persons per vehicle counted (less adjustments) artificially increased the number of total visits reported, from 294,535 in 1992 to 327,907 in 1993 without corresponding increases in the actual counts for Lodging, Campgrounds, Tent Camper, RV Campers, etc. Perhaps such adjustments should be noted in the Plan?

The development of additional facilities at Study Butte/Terlingua has not appeared to positively influence park visitation as shown in recreational visits. As in the Park, any development is dependent upon the infrastructure to support it; water being the most important; with sewer and electrical power being secondary. The developments outside the park were partially predicated upon river use that has, during the ongoing drought and dispute

## Response to Big Bend Resorts Letter

1. When known, the plan uses actual counts for analysis purposes.

Chisos Mountains Lodge

Basin Rural Station ★ Big Bend National Park ★ Texas 79834 ★ (915) 477-2292 ★ (915) 477-2352 fax ★ [www.bigbendresorts.com](http://www.bigbendresorts.com)

✿ A Forever Resort - Taking Time to Play ✿ Preserve ✿ Protect Our Natural Resources & Recreational Destinations™

with Mexico over water discharges from the Concho River, has made their economic future precarious.

2. The GMP/EIS extensively uses the 1992 University of Idaho survey to make factual statements regarding the park visitor's expectations. The availability of accommodations, as in the past, was an expectation not met. As the average park visitor ages in accordance with the general population, we feel that the Plans should have reflected the future expectations of these visitors. Before the Plan is implemented, we feel that an updated visitor survey would provide significant data not reflected in the 1992 study.

#### THE PREFERRED ALTERNATIVE #2:

Of the Alternatives presented, we would suggest that Alternative #2, with significant modifications should be considered. Each area of our concern is addressed separately below:

#### THE CHISOS BASIN:

##### Water:

At one time, the Chisos Basin housed a food service and restaurant operation, all concessioner employees, three NPS residences, two NPS RV sites all overnight visitors, a coin laundry, showers, the only upper Basin public rest rooms (besides in the campground), the campground, and a horse riding operation that used up to 40 horses during peak visitor season.

There have been concerns with the Oak Springs water supply for many years. During the peak visitation years of the 1970's Oaks Springs was able to meet visitor demands. The main water line from the springs to the Chisos Basin was then 27 years younger.

The 1979 EIS and 1980 GMP forecasted an increasing demand on this water supply. Steps were taken to reduce water consumption to accommodate the construction of the new rooms to replace the frame cottages:

Concessioner housing was reduced

The horse operation was discontinued

The laundry was removed

The showers were removed.

2. In the section of the plan on "Laws, Policies and Mandates" in the table with "Visitor Understanding and Park Requirements" the requirement to do an updated visitor survey has been added.

It should be noted that the “wetland” at Oak Springs (as well as the one at Cattail Falls) survived during this period of high visitation. The Lodge room occupancy increased only by an average of 2.5 rooms per night, possibly because the new accommodations were more appealing to the visitor than the frame cottages.

Drought:

The current stress on all Park water supplies has been experienced in the past. The shortages will continue until this cycle reverses as it has also done in the past.

Forever Resorts feels that the proposed GMP/EIS actions should include emphasis on the replacement of the MAIN WATER LINE. Hundreds of thousands of gallons of water have leaked from this main line, just in the Upper and Lower Basin. We feel that the Park should prioritize the replacement of the water line with a more sustainable material such as polyethylene that resists deflection by rocks, bends easily, and does not deteriorate over time. Only when the line is replaced and a reliable method developed to compare volume pumped to the Basin with volume received at the tank, can the Park make valid and meaningful decisions on future use of this precious resource.

The GMP/EIS notes that the wetland at Oak Springs has been affected. When more normal precipitation patterns resume, Oak Springs, as well as Cottonwood Wash will overflow during the winter months and run down their drainages toward Rough Run as they have in the past. These flows will regenerate the vegetation devastated by the recent drought.

Visitor Accommodations and Visitor Services:

Forever Resorts has partnered with Big Bend National Park to reduce water consumption by its Chisos Basin facilities and services.

If availability of water decreases, contingency plans have been in place for two years to reduce consumption by temporarily closing facilities and limiting services, as necessary, until adequate flows from the spring resume through the badly deteriorated water line.

The 1979 EIS Basin Development Plan was developed with the input of the previous concessioner, National Park Concessions, Inc. The total number of rooms permitted in the replacement of the old facilities was predicated on the minimum number of rooms that be economically feasible and could

3. The preferred alternative has been modified to reduce, if not eliminate, this impact.

support the restaurant operation – a service the Park considers necessary and appropriate, both then and now.

Removing a significant portion of the customer base for the restaurant would result in an unsustainable operation at its current levels. The short spring season peak business levels do not sustain the restaurant during the slow summer and winter months. The number of visitors who would not have an opportunity to stay in the Chisos Basin would be reduced by 8,572 visitors. This reduction in potential Lodge Restaurant guests would significantly impact our ability to maintain a financially sustainable facility.

Changes in the levels of service, i.e., shack bar, short-order, would only result in making the remaining rooms more difficult to rent since adequate food service would not be provided.

We support the retention of the employee dormitory and apartments since our restaurant service staff must work occasional split schedules. The management staff must also remain in the Basin to provide a point of contact in cases of emergency.

We have reservations regarding the removal of the NPS housing. In case of emergencies, such as a fire, any support from Panther Junction would be up to an hour in arriving in the Basin. We respectfully suggest that a core staff remain in the Basin as it has in the past.

#### PANTHER JUNCTION:

##### Panther Junction Service Station/Store:

4. There is a demonstrated need for an expanded facility to serve the visitor at Panther Junction. The existing facility should be replaced to provide not only gasoline and groceries, but the addition of showers would make the Basin Campground more attractive to the visitor by not having to drive to Rio Grande Village.

Showers at this location, as well as the provision of propane, would be a service to visitors who can only utilize these services at Rio Grande Village, especially during the summer. It may be that closing Rio Grande Village during the summer when no visitors use these services if they are available at Panther Junction could conserve resources.

An expanded retail operation would not only provide service to the visitor, but also be an amenity for the residents in Panther Junction, both for NPS and Concessioner staff.

4. The National Park Service would encourage additional development to be done outside park boundaries. During the development of the range of alternatives, consideration was given to expanding concession facilities in Panther Junction and other locations in the park. Without detailed analysis, it was determined that such actions in conjunction with other potential development could be stressful on the natural resources of the park, especially water. Further, such development could be subject to flash flood hazard. Also the level of proposed development in the park seemed adequate to meet the needs of visitors and park staff for the life of this plan.

In addition the Park Service examined the *replacement* of the Panther Junction service station/convenience store, and it will be part of the new concessions contract prospectus. The Park Service does not regard this as new development but as replacing an aging, out-of-date structure with a modern facility that will meet the demands of current and future visitors. The footprint will not be any bigger than the current development if you include the housing that used to be behind the current facility. Rather than have an automobile service bay, it will have public showers and more retail space as there are auto mechanics in the gateway communities now. They will still fix flat tires in the new facility, but there will not be full mechanic service.



Inclusion of this expanded Panther Junction retail facility in the GMP we feel must be considered

5. We understand that the National Park Concessions, Inc. Foundation has approved \$600,000 to be spent on upgrading the Panther Junction employee housing, a grant requested by Big Bend National Park. It would appear that this addition to the Panther Junction housing be considered in the GMP/EIS planning. This facility is badly needed and affects our ability to retain trained staff members.

#### RIO GRANDE VILLAGE:

We regret that the planning team did not have an opportunity to solicit our input when developing the plan for RV sites at Rio Grande Village.

6. Not considering the peak March-April peak season, there will be insufficient RV sites, with hook-ups available to the visitor. Visitor use during the shoulder season October–February could be enhanced by additional sites. The limit of 40 sites we feel should be expanded to make this service financially viable.

The park visitor avoids the Rio Grande Village area during the summer (the NPS closes its visitor center) but Forever Resorts must continue operation since the only public showers and propane-filling facilities are located here (see Panther Junction comments, above). The additional sites, up to 60 would go further to meet the increasing demand for RV sites. As noted above, the demographics of the visitor will increasingly be older, semi-affluent and embracing the use of RV's.

As stated in the GMP/EIS, the area is unique and provisions should be made for its enjoyment. The Study Butte/Terlingua facilities are 50 – 60 miles away and provide for the enjoyment of a far different desert environment.

At some point in time, Forever Resorts feels that the shower facility should be expanded along with the storage area of the store. This would allow fewer trips to re-supply the store during the peak visitation periods and provide the visitor with expanded shower facilities during the two peak months of park visitation as well as Christmas and Thanksgiving holidays.

5. The National Park Concessions Inc. Foundation approved \$600,000 to be spent to build two new duplex units that will provide eight bedrooms at Panther Junction. The park has this money in hand.

The design is from the *NPS Prototype Design Catalogue — Housing for Trailer Replacement — Permanent 2-Plex*, pages 12 and 13. The construction of new concessions housing is part of the concessions contract, which is currently on a three-year extension. Their new contract will also call for trailer replacement housing. This is not really new development, but, again, the replacement of very old facilities (trailers) with modern housing. This is NPS concessions policy.

Only two units have been approved, but the park also applied for a dorm-style building and a recreation hall. Again, the contract calls for this and they will be in Panther Junction. National Park Concessions Inc. is also working with the park on building housing outside of the park but, as the only 24/7 operation in the park, the concessioner has to have most of their employees housed in the park.

6. The current operation is a viable one with 25 sites. It will also be viable with 30 sites in an attractive, up-to-date RV park. The draft alternative B calls for *an increase of up to 40% in size with a total of 30 sites available*. NPS concessions policy requires that the overall contract provide a reasonable opportunity for the concessioner to make a profit, not for every facility or aspect of the operation to make a profit. The park is also considering turning the Rio Grande Village NPS campground over to the concessioner in the new contract, but a final decision has not been reached on that. The overall contract will provide ample opportunity for a reasonable profit.

Also, the National Park Service determines the appropriate level of commercial development in a park, not the current concessioner. When that determination has been reached, then the prospectus is released for bids.

#### RELOCATION OF HOUSING TO STUDY BUTTE/TERLINGUA:

Forever Resorts, as a method to increase the quality of life of its staff by reducing the over-crowded conditions they must now endure, would endorse this concept.

The GMP/EIS however, does not enter into specifics as to what levels the Panther Junction staffing levels would allow to remain.

Forever Resorts, if it is awarded a new contract, would consider replacement of the existing mobile home employee housing units with duplex, triplex or quadraplex efficiency units whereby our staff could have additional privacy without having to share their lives with four additional persons in one mobile home unit.

The quality of service provided by any concessioner is dependent upon having reliable long-term employees. The current living conditions cannot be tolerated for long periods of time by persons desiring a stable lifestyle without the distractions of up to three other persons living with them in close proximity.

The provision of ADDITIONAL employee as well as NPS and other Park employee housing, of various types, outside the park would allow Forever Resorts to develop a long-term staff.

As with any development in the Big Bend, the availability of an infrastructure, primarily water would be the limiting factor. Water in the Terlingua area is as limited as it is in parts of the Park. Any suitable location selected would also be near enough to avoid long commutes to and from the workplace. This would also result in an additional operational cost to Forever Resorts since many of our staff do not have the income resources to afford a long daily commute and a shuttle service of some kind would have to be developed. Perhaps the use of this service would be available to the park, school, natural history association and other employees as well at a reasonable cost.

7. The plan does not propose to locate concessioner employee housing outside the park. Rather than requiring the concessioner to build any housing outside the park, the National Park Service is encouraging the concessioner to do so. Concessioner housing levels in the park would remain roughly the same as they are now with most of the housing in the park. Having housing outside the park would add an additional operational cost that would be taken into consideration during the financial analysis aspect of the prospectus development.

Again, we appreciate the opportunity to participate in the planning process and would appreciate your keeping us informed of what modifications may be forthcoming before the Plans are adopted. We also would be available to provide our input on operational aspects of the plan as it develops. Please ask.

Sincerely,

*Betty Jo Roundtree*

Betty Jo Roundtree  
General Manager



**Brewster County Tourism Council**

**PO Box 335 Terlingua, TX 79852**

**Michael Davidson, executive director**

**[www.visitbigbend.com](http://www.visitbigbend.com) [coordinator@visitbigbend.com](mailto:coordinator@visitbigbend.com)**

**432-371-2210**

John King  
Superintendent  
Big Bend National Park, TX 79834  
To whom it concerns,

July 29, 2003

At a duly called meeting of the Brewster County Tourism Council dba Visit Big Bend Tourism Council, held on July 29, 2003, the Council approved the following language: Be it resolved that the Brewster County Tourism Council strongly opposes the elimination or reduction of any visitor facility or employee residence in the Chisos Mountains Basin. Be it further resolved that the Council supports the provisions found in Alternative B of the Draft Management Plan for Big Bend National Park excepting for those provisions that call for the elimination or reduction of any visitor facility within Big Bend National Park.

The Council instructed the executive director to submit this letter as its official comment to the Draft General Management Plan, and to add the sentiment that once a final plan is in place, the Council would be eager to collaborate with BBNP managers, Friends of Big Bend, and any other interested parties in efforts to locate and secure funding for infrastructure needs described in Alternative B.

Sincerely,

Michael Davidson

*Michael Davidson*

Cc: Tourism Council Members  
Hon Val Beard, Brewster County Judge

# NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations<sup>SM</sup>

Received

SEP 12 2003

DSC-PSD

August 25, 2003

Mr. John H. King, Superintendent  
Big Bend National Park  
P.O. Box 129  
Big Bend National Park, TX 79834-0129

Dear Mr. King:

Thank you for the opportunity to present our views on the park's **Draft General Management Plan/Environmental Impact Statement (DGMP/EIS)** on behalf of NPCA's 300,000 members nationwide. We are very pleased that the National Park Service has seen merit in updating Big Bend's GMP considering the considerable resource challenges that confront the park today. We also thank you for extending the public comment period until August 30, given the size and complexity of the plan.

## Purpose, Need, and Scoping

1. Primary Interpretive Themes (p. 7). Since the park does not have a Comprehensive Interpretive Plan (CIP), it may be worthwhile to note that these are current themes and that these may be subject to revision when a CIP is developed. The DGMP should make it a priority for the park to develop a CIP within the near future.
2. Issues Beyond the Scope of this Plan (p. 10). While the DGMP correctly notes that air and water quality are issues that originate in other jurisdictions largely beyond the purview of NPS, the DGMP could be strengthened by to: 1) remind the public of the NPS' goal of non-impairment of these resources originating from its Organic Act; 2) a stronger declaration of NPS' intent to work in partnership with other agencies and organizations to address the documented severe degradation of these resources in the park; 3) discuss the general monitoring NPS should be conducting to document changes in the park resources affected by these external threats. Directing the reader to actions required by NPS policy listed on pages 18 (Water Resources) and 23 (Air Quality) would be helpful, rather than the implication here that nothing will be done on these issues.
4. We are puzzled by the DGMP's declaration that riparian vegetation and exotic species (plants, animals and diseases) are beyond the scope of NPS to control and therefore are dismissed in the DGMP. On what basis are these beyond control? Vegetation impacts may be a question of law enforcement and our understanding is that the park has no law enforcement rangers regularly patrolling the backcountry. This becomes a question of park funding and funding priorities by NPS. In addition, the

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## Response to National Parks Conservation Association Letter

1. Preparation of a comprehensive interpretive plan has been added to the "Laws, Policies and Mandates, Visitor Understanding and Park Use Requirements" section.
2. Please see the *Draft General Management Plan*, pages 12 and 1
3. The revision has been made.
4. Management of riparian vegetation and exotic species is governed by laws, policies, and mandates of the federal government and the National Park Service. They are not beyond the scope of NPS management. In fact, wetlands (including riparian areas) are an impact topic in the document. Therefore, the paragraph on riparian vegetation has been deleted.

Because management of exotic species is governed by laws, policies, and mandates, and no proposals of the general management plan alternatives would necessitate further action, exotic species are not an impact topic in the *General Management Plan /Environmental Impact Statement*.

Organizations



5. document should address monitoring, mitigation and restoration efforts, again a function of funding, that would be conducted should funding become secured. These topics should be addressed, rather than the implied message here that no efforts will be expended on these issues.

6. **Laws, Policies, and Mandates**  
Although page 15 of this section describes the recent plans completed (Water Resources Management Plan, Wildland Fire Management Plan, etc.) this section does not explore what possible plans are needed in the future to comply with NPS policies. While no one can say with certainty each and every plan needed over the lifetime of the GMP, surely there are significant plans that have never been developed, or plans in need of updating, that the staff can identify. In some cases, plans have been developed, but there is no qualified staff person to update the plan or implement it. These cases should also be identified. For example, some of the deficiencies we have found are as follows:

- Inventory & Monitoring Plan – not mentioned
- Archeological Overview and Assessment (1974) – needs updating
- Ethnographic Overview and Assessment – none
- Museum Management Plan (1990) – no curator to implement
- Collection Management Plan (1994) – no staff to use it
- Historical Preservation Plan (1968) – good for historical resource management information only
- Comprehensive Interpretive Plan – none. This should address development of curriculum materials and outreach to gateway community schools, among other issues.
- Vegetation Plan – in progress? Needed for invasive, non-native species such as tamarisk and buffelgrass, but what is the park's plan?
- Wildlife plans – only mountain lion and black bear response plans exist
- Stock Use Plan – stock assessment is needed, then a plan developed
- Visitor Use Plan – perhaps carrying capacities for particular areas need to be determined over the next 20 years?
- Fish Management Plan – reduced river flows and water quality degradation have extirpated at least seven fish species in the park
- Land Protection Plan – what lands should be acquired from willing sellers or which conservation easements should be arranged to better protect park values? An inholding near the entrance to Persimmon Gap, the Pittcock Ranch, lands in the Christmas Mountains and Northern Rosillos portion of the park are worth discussion and very relevant to park preservation. The need for such a plan may be addressed on p. 27.

In addition to these plans, NPS policies regarding identification and protection of the park's cultural landscapes are not addressed. The DGMP should address this deficiency and discuss the work needed to get appropriate sites listed in the National Register of Historic Places and secure their preservation.

We are pleased to see "Natural Sounds" and "Night Sky" issues addressed as part of NPS policies as these resources are particularly important at Big Bend. We would encourage the park to identify current (baseline) conditions for the status of these

5. See the "Laws, Policies, and Mandates — Wetlands, and Exotic Species," and "Mitigation and Additional Studies" sections.

6. The park staff has listed the plans they find most necessary under "Laws, Policies and Mandates," and "Mitigation and Additional Studies." The need for a comprehensive interpretive plan was added to the "Laws, Policies, and Mandates" section. Cultural landscape studies are addressed in "Mitigation and Additional Studies" section. At the end of each alternative, under "Estimated Costs," is the percentage increase in employees that would be needed to implement the alternative.

resources, so that future degradations or improvements can be monitored and documented.

#### Alternatives

We support Alternative C as providing the best protection for the critical resources that comprise Big Bend National Park and many of which will likely to decline further without bold management action taken soon. However, realizing that Alternative C's prescription to remove all development at the Chisos Basin and Rio Grande Village is not a politically viable alternative, we would prefer to see NPS embark on course of action that is somewhere between Alternatives B and C – prescribing removal of more development than B, but not complete removal of all facilities. The goal should be to remove more of the development footprint in the park and thereby reduce water usage and improve the natural landscape.

Towards this goal, we would prefer to see the airstrip in the park removed and land restoration conducted at this site, unless this is considered as part of an important cultural landscape within the park to be protected and interpreted.

On page 62, visitor services are described and we strongly support the creation of a new, expanded visitor center. However, given the long-term growth of visitation to the park, we would advocate that the DGMP should state the potential need for development of a carrying capacity plan, such as the V.E.R.P. model (Visitor Experience and Resource Protection), or Limits of Acceptable Change, would determine. Indeed, NPS is legally bound to determine carrying capacity for park resources.

7.

8.

On page 64, Park Boundary, we would encourage NPS to better analyze and address the boundary issue. Is the DGMP saying that there is no foreseeable need to adjust park boundaries to better protect park resources? Similarly, the issue of private land inholdings should be analyzed, discussed in terms of resource protection and a range of protection strategies for these properties identified as opportunities may present themselves.

On page 101, the description of human impacts in the Chisos Basin and Rio Grande Village, are enough to require that visitor and water use be reduced. The NPS needs to require water use conservation in all of its alternatives to the maximum extent practical. The minimum in-stream flows necessary to protect the river ecosystem should be determined soon and partnership efforts begun to work towards this goal.

7. In the "Laws, Policies and Mandates," "Visitor Understanding and Park Use Requirements," section (page 33 in the draft plan), the last bullet describes the approach that will be taken regarding carrying capacity.
8. According to *NPS Management Policies 2001*, lands within authorized park boundaries can be acquired or managed using methods that protect the park's resources. On lands within the authorized boundary that have not been acquired, the National Park Service would seek, in cooperation with landowners, to provide appropriate protection measures. For example, both the inholdings near Persimmon Gap and the Pitcock Ranch are already within the approved park boundary. The park staff would attempt to acquire them should the opportunity arise.

As part of the planning process, the National Park Service is required to identify and evaluate boundary adjustments that may be necessary or desirable to carry out the purposes of the park unit. As found in *NPS Management Policies 2001*, section 3.5, boundary adjustments may be recommended to:

- Protect significant resources and values, or to enhance opportunities for public enjoyment related to park purposes;
- Address operational and management issues, such as the need for access or the need for boundaries to correspond to logical boundary delineations such as topographic or other natural features or roads; or
- Otherwise protect park resources that are critical to fulfilling park purposes.

During the course of the planning process it was determined that no lands outside Big Bend National Park met the above-mentioned criteria. This finding will serve as guidance for updating the park's *Land Protection Plan*.

See the "Ideas Suggested and Eliminated from Further Consideration" section (page 75 in the draft document), which found that the lands of Christmas Mountains were "protected by a strict conservation easement, and that the easement remains in place regardless of ownership. The easement will protect the park viewshed and the Christmas Mountains from any development."

**Environmental Consequences**

9. On page 131, implementing the DGMP and protecting park resources will require a significant increase in the number of law enforcement personnel for dealing with illegal cattle grazing, poaching as well as other issues involving smuggling and illegal immigration. As we have witnessed in Organ Pipe Cactus National Monument, illegal traffic across a park's border can quickly and significantly impair park values as well as jeopardize human lives. As the border is hardened in other locations, the problem for Big Bend will only grow worse. To neglect the law enforcement issues as they relate to resource protection for this park over the next 20 years is to put blinders on what may become THE most critical issue facing natural resources in the park.

10. On page 134, we question your words of description. It is not a "minor" impact if water use changes by up to 25%, nor "moderate" for a change up to 49%. In both cases, these percentages should be greatly reduced.

Similarly, on pages 174-182 under Alternative C, in our view NPS is underestimating the beneficial impacts to vegetation, wildlife, etc., by ceasing to withdraw water (4 million gallons/year in Oak Spring and 942 acre feet/year in Rio Grand Village) compared to Alternative A. NPS calls this "moderate" beneficial impact when we suspect this would be a major or significant beneficial impact.

11. On page 149 the DGMP states the park's goal is to increase the number of structures on the List of Classified Structures in "good" condition from 38% to 50%. Given this document's shelf life of about 20 years, we suggest this is a very modest goal and achieving 50% is not satisfactory. The park should have a goal for structures currently in "poor condition". The DGMP should state as a goal that the 19 out of 69 structures on this List that are currently rated in "poor" condition (or an appropriate number) are rehabilitated to at least "fair" condition. We are especially concerned about Luna's Jacal which is in the National Register and is listed in "fair" condition despite its roof caving in. Continued neglect over the short-run may result in the very unfortunate situation whereby the structure is beyond repair and this cultural resource is lost forever.

**Omissions**

Perhaps we missed it, but does the DGMP discuss the possibility of creating a NPS "Learning Center" near or in the park? The learning center might occupy a historic building at Castolon where the historic district is already contrived. Also does the document sufficiently stress the need for research in and about the park and the need to identify research priorities, develop partnerships for conducting needed research, and promoting research possibilities? For this to occur, perhaps additional housing is needed. Hopefully, this could be created outside the park. It would be helpful to know how the park's "International Biosphere Reserve" status should impact the research program compared to other parks without this status.

In conclusion, these are ways in which we believe the draft GMP/EIS can be strengthened and park resources better protected. For each suggestion we have provided, there are many strategies and actions in the document with which we agree. We again thank you for this opportunity to present our views and look forward to seeing the final GMP and its implementation.

Sincerely,



Mark R. Peterson  
Director, State of the Parks

9. In all alternatives including no action, the park has undertaken and continues to undertake a series of measures designed to better protect park resources and provide for enhanced visitor safety. The park's goal is to eliminate cross-border illegal activities and to provide sufficient law enforcement presence to deter such activities. The partnership between the U.S. Border Patrol and the park would be strengthened to provide for additional security. The park continues to upgrade communication capability and other equipment necessary to accomplish this task.
10. The intensity definitions for water quantity have been revised. The suggested change in intensity level has been made.
11. The statement on page 149 (in the draft plan) refers to existing conditions at the park and not the preferred alternative for cultural resources. By following laws, regulations, and policy, the National Park Service will continue to protect and preserve all significant cultural resources in the park.





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Received

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August 10, 2003

Mr. John H. King  
Superintendent  
Big Bend National Park  
National Park Service  
P. O. Box 129  
Big Bend National Park, Texas 79834-0129

Dear Superintendent King,

Enclosed are the comments of the Houston Sierra Club (HSC) regarding the proposed Draft General Management Plan (DGMP) & Environmental Impact Statement (EIS) for Big Bend National Park (BBNP).

Please make note of my address at the end of this letter. I did not receive a copy of the news release about the open house meetings and I want to make sure that I am listed on the National Park Service's (NPS) contact list for BBNP.

#### Purpose and Need for the Plan

1. 1) On page 7, **Mission and Goals, Park Purpose**, it is of concern to the HSC that the Rio Grande, which along with other riparian/wetland ecosystems and the Chisos Mountains/Basin ecosystem, is the most sensitive and important vegetation and wildlife habitat, is not protected in this plan. The NPS must provide an amendment to the DGMP/EIS when the Rio Grande Wild & Scenic River Plan is finalized to link the two plans and provide an overall set of objectives specifically for protection of the Rio Grande in BBNP and for the parts of the Rio Grande Wild & Scenic River that are not located in BBNP.
- 2a. 2) On pages 8-10, **Mission and Goals, Primary Interpretive Themes and Issues, Issues Beyond the Scope of this Plan**, although the DGMP/EIS documents that, "1. Major resource threats, such as air and water pollution, intrusive sounds, and the presence of exotic plant and animal species as well as vandalism, graffiti, and the illegal collection of plants and animals, negatively impact both the resources of the park and the visitor experience ... 3. Though rarely seen, water constitutes the most important resource in the Chihuahuan Desert environment. Water is the architect of the desert, and its presence or absence affects the desert's appearance, plant and animal life, and the ways that humans can use it", the NPS then turns around and abdicates its responsibility to protect these resources via the DGMP/EIS. The significant, environmental

"When we try to pick out anything by itself, we find it hitched to everything else in the universe." John Muir

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## Response to Sierra Club Letter

### 1. Rio Grande and other riparian/wetland ecosystems.

Please see the "Wetlands" section in the "Laws, Policies and Mandates," section of the "Purpose of and Need for the Plan" chapter (page 21 in the draft document). The National Park Service is required by law, policy, and executive order to protect wetlands. Actions that the Park Service will take to comply with these mandates are listed in that section.

The preferred alternative (alternative B) proposes finding a separate source of water for human use at Rio Grande Village and relocating some campsites farther from the gambusia pond. This would, in addition to eliminating the source of impacts on the gambusia, improve the condition of the pond and associated wetlands.

**Chisos Basin.** Most of the Chisos Basin is in designated wilderness and is protected. Alternative C in this *General Management Plan / Environmental Impact Statement* proposes removing all development from the Basin except the main road, a parking area, and a restroom. This alternative received almost no support from the public. Objections included that it would eliminate the only non-camping overnight accommodations in the park and make it more difficult for many people to visit. Chisos Basin is a favorite area of visitors. The plan's preferred alternative, alternative B, proposes no additional development in the Basin and proposes removing one NPS employee residence and an NPS bunkhouse (and relocating them to Panther Junction).

**Rio Grande Wild and Scenic River Plan.** The draft management plan states (pages 15-16) that "The GMP proposes no actions that could adversely affect the values that qualify the Rio Grande River for the national wild and scenic river system. None of the actions proposed in this draft *General Management Plan* conflict with the draft river management plan." The Rio Grande Wild and Scenic River (WSR) is a separate unit of the national park system. The WSR plan, including objectives for managing the river, will govern how the river is managed. The *General Management Plan / Environmental Impact Statement* for Big Bend will

Response 1 continues on next page.

issues of air quality, water quality, riparian vegetation, and exotic species will not be covered by the DGMP/EIS because NPS says they are "not under NPS control." This is untrue.

Air pollution can be affected by NPS via its authority under the Federal Clean Air Act, its relationship to its sister agency, the Environmental Protection Agency (EPA), its ability to work through the State Department on air quality issues dealing with Mexico, its relationship with the state environmental agency, the Texas Commission on Environmental Quality (TCEQ), and its independent authority under the 1916 Organic Act to **"provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."** In the General Authorities Act of 1978 the NPS must protect the National Park System and **"The Secretary has an absolute duty, which is not to be compromised to fulfill the mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the national park system."**

In addition, the **Management Policies 2001 document**, for General Management Plans, states, "The purpose of each GMP will be to ensure that the park has a clearly defined direction for resource preservation and visitor use ... It will focus on why the park was established, and what management prescriptions (i.e., resource conditions, visitor experiences, and appropriate types of management actions should be achieved and maintained over time. The GMP will take the long view, which may project many years into the future ... **The plan will consider the park in its full ecological, scenic, and cultural contexts as a unit of the national park system and as part of a surrounding region** ... GMPs will meet all statutory requirements contained in 16 USC 1a-7(b), and will include: **The type of management actions required for the preservation of park resources** ... Decisions documented in the GMPs ... will be based on current scientific and scholarly understanding of park ecosystems and cultural contexts, and the socioeconomic environment (both internal and external in relation to park boundaries)."

236

2b.

The same is true for the issues of water quality, riparian vegetation, and exotic species. **In particular, for riparian vegetation, it is specifically disingenuous for the NPS to admit that illegal grazing has caused "the lack of native riparian tree species reproduction, areas of vegetation trampling, areas where grass has been grazed, stock trails, eroded riverbanks, and the spread of exotics through fecal material" and then say this will not be addressed in the DGMP/EIS.**

cover management of the park up to the river. Both units are managed by the staff at Big Bend National Park. This means that there is no need for a separate document to reconcile the GMP and the WSR plan.

- 2a. **Air Quality.** Please see pages 12 and 13 of the draft document that describe the park's air quality monitoring program, the park's ongoing negotiations with Mexico, and the ongoing cooperation with the Texas Commission on Environmental Quality, NPS Air Resources Division, and U.S. Environmental Protection Agency. Page 13 states that the impact topic was dismissed because "There are no general management plan proposals that, when considered along with required mitigation, would further impact air quality."

Page 23 of the draft document describes specific actions that National Park Service will take in cooperation with the Texas Commission on Environmental Quality and the Environmental Protection Agency to monitor air quality and ensure that it will be maintained at the cleanest level possible.

- 2b. **Water quality.** Page 13 of the draft document explains that the park has developed a "Water Resources Management Plan" that describes strategies the park staff will employ to address, among other issues, water quality. Actions proposed in the general management plan might impact water quality positively by raising fuel tanks above the level of the 500-year floodplain or protecting them from the 500-year flood. This would reduce the chances that fuel would enter floodwaters. These beneficial impacts do not necessitate addressing water quality further.

Page 18 of the draft describes specific actions that the National Park Service will take, on its own or in cooperation with others, to monitor and improve water quality.

**Intrusive sounds.** Please see page 25 of the draft document for actions that will be undertaken to protect quiet and natural sounds.

*Response 2b continues on next page.*

**Riparian vegetation.** This topic was not dismissed. Impacts on riparian vegetation from implementing alternatives of the plan are described in the "Environmental Consequences" chapter under "Natural Resources, Wetlands." Additional actions are described on page 21 of the draft.

**Exotic species.** Perhaps it was difficult to find the information on page 19 in the draft document about exotic species because it is combined with threatened and endangered species. Actions that the Park Service will take regarding exotic species were placed under a separate heading under "Laws, Policies, and Mandates" in the final document. A mitigating measure is on page 77 of the draft document under "vegetation."

**Vandalism, graffiti, and the illegal collection of plants and animals.** These are illegal activities that are prohibited by law and policy. The park's interpretive program endeavors to educate visitors about the impacts of these activities and the fact that they are illegal. Apprehending and prosecuting people who engage in these activities is an ongoing activity of law enforcement personnel.

**Illegal grazing.** This issue is beyond the scope of the general management plan because it is a law enforcement issue for which direction is not needed. Law enforcement personnel simply need to continue to work with Mexican villages to educate them about the consequences of allowing their cattle to cross the border, enlist their cooperation, and enforce existing park rules and regulations when and if cattle do cross the border.

Current law enforcement efforts would continue under any of the alternatives. Park staff would continue with both education and enforcement actions. These include trespass livestock roundups where the stock rounded up is confiscated, as well as such things as furnishing used fencing materials to the Mexican ranchers so they use them to block easily used access and crossing areas on the Mexican side of the river. However, the closing of the border has severely

*Response 2b continues on next page.*



- 2c. This lack of interest in addressing significant issues in the DGMP/EIS is particularly galling on page 56 of the DGMP/EIS, when the NPS states that **"The following portions of the park have been excluded from the wilderness proposal: (1) areas along the Rio Grande and south of the River Road that are less than 5,000 acres and are impacted by citizens of Mexico and fishermen"**. This action is illegal and a distortion of what the Wilderness Act requires. The Wilderness Act does not arbitrarily limit Wilderness Areas to 5,000 acres. The Wilderness Act states, "has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition." It is ridiculous that the NPS will not protect lands that are of Wilderness quality near the Rio Grande, one of the most sensitive biological areas in all of BBNP, and does not address this issue of protection of potential Wilderness and illegal use and trespass in this DGMP/EIS.

- 2d. **Executive Order 13112, Exotic Species**, can be used by the NPS to address exotic species in BBNP. There is nothing in this DGMP/EIS which discusses this possibility. There are discussions that can be undertaken with the State Department and Mexico to address this problem. There are methods of fencing, confiscation, fines, and other administrative mechanisms that can be used.

The NPS can list several objectives for each of the above mentioned issues that will be pursued in the DGMP/EIS over the next 20 years. The American people need an NPS that is innovative and imaginative and not helpless. The American people depend on NPS to use its professional expertise to resolve these issues in the DGMP/EIS and not ignore them.

- 2e. The NPS can approach the TCEQ to resolve air and water issues. If the TCEQ balks the NPS can go to the U.S. EPA, which has oversight authority over the State, for assistance. As a last alternative, the NPS can sue the TCEQ for not enforcing its water quality rules or promulgating air quality rules for visibility protection which have resulted in the degradation of the public's natural resources that NPS is charged with stewarding.

impacted the ability of park staff to communicate with the ranchers and protected area staff directly. Again, under any of the alternatives, these efforts would continue. Although park staff does not have control over Mexican livestock when they are on the Mexican side of the river, it can and does take action when livestock cross into the park. Confiscating livestock, and not returning them to Mexico, has proven to be a very effective method to raise awareness and stop this destructive activity.

Reducing the irrigation at Rio Grande Village would not have a significant impact, if any, on this issue.

- 2c. This information comes from the approved 1984 wilderness proposal. It is not a proposal of this plan. The National Park Service is required to evaluate for wilderness designation lands added to units of the national park system. The draft wilderness suitability assessment (appendix E, pg. 222 in the draft document) evaluates for wilderness values, all lands added to the park since the 1984 *Wilderness Study*. Most public comment has been opposed to designating additional wilderness at the park.

There was no call for the reevaluation of the original 1984 wilderness proposal by anyone during the initial scoping process. Comments focused only on the North Rosillos/Harte Ranch addition and the possibility that all or parts of it may be eligible for wilderness designation. The park will do a wilderness study on the lands found suitable for wilderness by the "Wilderness Suitability Assessment."

- 2d. **Exotic Species.** See response 2b, exotic species.

- 2e. **Air and Water Issues.** See responses 2a and 2b.



3. 3) On page 9, **Issues to be Addressed, Water Quantity**, the NPS does not provide in the DGMP/EIS any objectives for how it will work with the TCEQ, Mexico, the State Department, and others to ensure that sufficient water is left in the Rio Grande to ensure a viable, naturally functioning, wild and scenic river and a naturally functioning aquatic and riparian ecosystems. It is obvious that the Rio Grande is beyond its carrying capacity in providing water for human needs and in wastewater treatment capacity and that use must be scaled back to protect the ecosystems in BBNP. But NPS gives no indication how it will address in stream flows, water pollution, and riparian and aquatic ecosystems' health.
4. 4) On page 10, **Impact Topics (Resources and Values at Stake in the Planning Process), Natural Resource Topics**, the NPS is strangely silent about the important resources of solitude, quiet, and natural sounds and how they will be protected in this DGMP/EIS. There need to be specific objectives about how NPS will protect these three interrelated resources from impacts due to all other activities, uses, and areas allowed in BBNP.

3. A general management plan focuses on "what" the park plans. Subsequent, separate plans that tier off the general management plan will provide more detailed information on "how" the National Park Service will accomplish these goals. For instance, it would hardly be productive or effective to threaten to sue a state agency in a general management plan on the basis of what they may or may not do in the future. See response 2a above regarding air quality, response 1 above regarding the wild and scenic river, response 1 above regarding riparian vegetation, and response 2b above regarding exotic species.

**Water Quantity.** Please see page 18 of the draft for specific actions the Park Service will take to address water quantity. Page 47 states that the park has already instituted a program of conservation and visitor education on the need to limit water use and the role of water in a desert environment. The last paragraph on page 47 states that the Park Service would continue coordination with agencies and other groups regarding water quality and quantity in the Rio Grande.

In alternative B, the preferred alternative, beginning on page 55 of the draft document, several actions would reduce park use of water and have a positive impact on water quantity. Actions mentioned in the preferred alternative include reducing irrigation water use at Rio Grande Village by 59%, phasing out plants that are heavy water users at Rio Grande Village and Cottonwood Campground, relocating up to 15% of NPS personnel to gateway communities, and removing some development from Chisos Basin.

4. Please see the draft document page 25 for actions that will be undertaken to protect quiet and natural sounds.

The only area that would receive any new use under alternatives described in the draft document is the Harte Ranch - an interpretive area in the Buttrill Spring area. The area is zoned backcountry nonwilderness. There would be virtually no impact on solitude from implementation of the preferred alternative.

*Response 4 continues on next page.*

5. 5) On page 13, **Impact Topics Considered and Dismissed From Further Consideration, Air Quality**, it is patently ridiculous to state "there would be no impacts on air quality from implementing any of the actions in the alternatives of this GMP." By not implementing any air quality objectives the NPS ensures that air quality will continue to violate the Prevention of Significant Deterioration provision of the Clean Air Act and the regulations that implement this provision as well as degrade the air environment while the Regional Haze regulations and planning start to kick in.
6. 6) On page 13, **Impact Topics Considered and Dismissed From Further Consideration, Water Quality**, it is untrue to say that "water quality is not an impact topic in this document." NPS has no objectives in this DGMP/EIS that require agreements with the TCEQ, EPA, State Department, and Mexico to ensure that water quality is improved in the Rio Grande. By not requiring objectives that commit to water quality improvement Rio Grande water quality will degrade the next 20 years. There will be more people and thus more sewage created in the next 20 years. NPS is abdicating its responsibility to protect water quality in BBNP.

#### LAWS, POLICIES, AND MANDATES

7. 1) On page 15, **Proposed Wilderness Classification**, the HSC supports the NPS policy that manages proposed Wilderness as Wilderness until the U.S. Congress decides whether Wilderness designation is warranted. We support the already 533,900 acre proposal for Wilderness that the NPS made in 1984.

In Appendix E, the total potential acres of Wilderness in the new, North Rosillos and Nine Point Units are 23,300 acres and 39,400 acres respectively. This is a total of 62,700 acres. However, the NPS only proposes that 25,700 acres be designated as Wilderness. There is no explanation why the total proposed Wilderness acres is less than the total potential Wilderness acres and there are no alternatives that provide for different amounts of proposed Wilderness acres. The DGMP/EIS must provide the total acres in the North Rosillos/Nine Points Units, the reason for why 25,700 acres was chosen, the reason why the other acres suitable for Wilderness were not chosen, and the reason why there are no alternative Wilderness acre proposals. The HSC does not support elimination of Wilderness acres because there is a road that separates the North Rosillos and Nine Point Units. The HSC supports the designation of at least all 62,700 suitable for Wilderness acres.

Most of the park is proposed wilderness under the park's 1984 "Wilderness Study/ Environmental Impact Statement." The park manages these lands, most of the park, for their wilderness values. Solitude is one of these wilderness values. None of the alternatives in the draft plan propose to alter management of the proposed wilderness. Therefore, the wilderness value of solitude will not be impacted by the plan.

5. Air Quality. Please see response 2a, air quality.
6. Water Quality. Please see response 2b, water quality.
7. The wilderness suitability assessment is the initial step in a process that is separate from the general management plan. Park staff studied the two units that have been added since the 1984 *Final Environmental Impact Statement, Proposed Wilderness Classification*, applied the criteria in the Wilderness Act, and found the acreage described in the wilderness suitability assessment suitable for wilderness. The "Draft Wilderness Suitability Assessment" is preliminary. Its findings are provided in the document for public information only. A wilderness suitability assessment does not require that alternatives be formulated.

Approval of the general management plan will not constitute approval of the wilderness suitability assessment. The wilderness suitability assessment has not been approved by the NPS regional director of the Intermountain Region or the director of the National Park Service. If the wilderness suitability assessment was approved by these officials, a wilderness study would be undertaken. A notice of intent to prepare an environmental impact statement on a wilderness study would be published in the *Federal Register*. The notice of intent would request that agencies and the public identify issues to be addressed (scoping). The study would consider alternative configurations of wilderness and would be accompanied by an environmental impact statement. A wilderness hearing would be held on the *Draft Wilderness Study / Environmental Impact Statement*. Only after completion of the *Wilderness Study / Environmental Impact Statement* and signing of a "Record of Decision" could there be a wilderness proposal for the North Rosillos and Nine Point units. Then Congress would have to act for wilderness to be designated.

8. 2) **On page 16, Wilderness Suitability Assessment**, the HSC requests that it be notified by the NPS when the Director approves the Wilderness Suitability Assessment and a final determination of the area's suitability or nonsuitability as Wilderness is made. The HSC requests that it be sent a copy of that decision that is printed in the Federal Register.
9. 3) **On page 17, Natural Resource Management Requirements, Soils**, the phrase, "does not unacceptably alter the physical, chemical, or biological characteristics of the soil, biological community, or surface or ground waters" is used. There is no explanation or definition about what this phrase means in the proposed DGMP/EIS. Please provide a detailed explanation.
10. 4) **On page 18, Natural Resource Management Requirements, Water Resources, Compliance Actions**, the phrase, "Work with interested groups along the border to achieve cooperative ecosystem management of the Rio Grande corridor through a long-term, comprehensive plan for conservation and use." What is this plan? Who are the interested groups? How can a group or person participate in formulating this plan? When will this process begin? How will NPS get cooperation from Mexico? If this plan is a basic part of the DGMP/EIS then a description, objectives, and potential schedule should be in the DGMP/EIS for public review and comment.
11. 5) **On page 19, Natural Resource Management Requirements, Threatened and Endangered Species, Compliance Actions**, no compliance actions are listed for bats. Their use of BBNP and the requirement for habitat in BBNP for their well-being is absolute. The HSC requests a compliance action that addresses bat conservation in BBNP and nearby areas (cooperative agreements with private, State, and Mexican landowners).
12. 6) **On page 22, Natural Resource Management Requirements, Wilderness, Compliance Actions**, the use of any motorized or mechanized equipment must not be allowed in Wilderness unless an analysis has shown that it is the "minimum tool" that is needed to provide required Wilderness management. The HSC requests that it be notified when there is any proposals to update the Wilderness management plan or for any action which requires National Environmental Policy Act (NEPA) action.
13. 7) **On page 23, Natural Resource Management Requirements, Air Quality, Compliance Actions**, NPS states that it will, "Participate in federal, regional, and local air pollution control plans and drafting of regulations and review permit applications for major new air pollution sources" and "Maintain constant dialogue with the TCEQ regarding visibility conditions at the park" and "Participate with the Air Resources Division on the regional planning group that includes TNRCC that was formed to address regional haze issues in the central United States."
- A discussion about the current status of these three items needs to be included in the DGMP/EIS so that the public can review and comment on the current situation. The public also needs NPS proposals for the future so it can review and comment on their efficacy in getting clean air for BBNP in the future. For the last bullet, please replace "TNRCC" with "TCEQ".

8. The Park Service does not send copies of the *Federal Register* to members of the public. The *Federal Register* is available at larger libraries and on line. The park would issue press releases throughout any wilderness study process both for general information and to announce public meetings.
9. As shown on page 17 in the draft plan, this is an excerpt from *NPS Management Policies 2001*. Determining specific criteria for implementing this policy is not consistent with the broad level of planning in a general management plan (Director's Order 2). Such criteria would be developed by resource professionals based on site-specific conditions at the time of implementation of specific actions.
10. The general management plan is general and conceptual in nature. The details of how and with whom the long-term comprehensive plan for conservation and use of the Rio Grande corridor would be developed will be determined as part of a separate process.
11. The draft plan, pages 11 and 12, explains why the Mexican long-nosed bat is not an impact topic.
12. Public notice will be given for any undertaking requiring it.
13. As explained on page 10 in the draft plan, these items are beyond the scope of the general management plan. However, the park is working with others to improve air quality.



8) On page 26, **Natural Resource Management Requirements, Wildland Fire, Compliance Actions**, the emphasis should be to allow naturally started fires to burn. Prescribed burning does not appear to be warranted in a natural, self-willed, ecosystem. There are no current obstacles, other than a few roads, that prevent lightning started fires from burning where they will in BBNP. Lightning frequency is not known to be less now than it was 200 years ago so there is no reason to use prescribed fire in potential Wilderness in BBNP at this time.

14.

9) On page 27, **Natural Resource Management Requirements, Backcountry**, NPS states that "The Park Service will seek to identify acceptable limits of impacts, monitor backcountry use levels and resource conditions, and take prompt corrective action when unacceptable impact occur." Change this so that "The Park Service **will identify** ..." acceptable limits of impacts, etc. It is very important that in potential Wilderness that the NPS does not set-up zones of impact that will serve as sacrifice areas for recreational use impacts. All potential Wilderness acres should be managed so that the impacts of humans are as "unnoticeable" as possible. In managing non-Wilderness as Wilderness the NPS is required to protect the Wilderness character. The type of management we have outlined above will protect Wilderness character.

15.

10) On page 27, **Natural Resource Management Requirements, Land Protection**, the HSC is very concerned that the NPS is not proposing in this DGMP/EIS any areas that may be acquired if opportunities arise. When the HSC contacted BBNP in 2001 concerning the "Special Places Report" that the Lone Star Chapter of the Sierra Club released last year (2002), we were told by BBNP personnel that because there is no up-to-date land plan that there were no formal lands that BBNP could recommend for acquisition. However, the NPS was going to update the land plan in the DGMP/EIS.

The HSC was told by BBNP personnel that there were several land areas that might be of interest for NPS acquisition. One area is a 300 acre in-holding near the entrance to Persimmon Gap that should be acquired to prevent incompatible development or the marring of scenery. Another area that could be acquired was the 20,000-25,000 Pittcock Ranch, which is an in-holding in the Northern Rosillos Ranch part of BBNP. Again, this would prevent any major development within BBNP. Finally, there was about 10,000 acres in the Christmas Mountains, the acquisition of which would protect scenic views and buffer BBNP. The HSC adds to these possible acquisition areas, lands that could connect BBNP, via corridors, to Big Bend Ranch Natural Area and Black Gap Wildlife Management Area, additional in-holdings in the Northern Rosillos part of BBNP, and areas near developing lands, like Terlingua Ranch and Lajitas Resort, where development could occur right up to BBNP boundaries, ruin viewsheds, and that could be acquired as buffers.

The HSC requests that the NPS incorporate in the DGMP/EIS possible areas for acquisition for BBNP for the next 20 years and request from the public their recommendations. This will allow NPS the flexibility to take advantage of opportunities to acquire important lands if they become available since their possible acquisition will be in the DGMP/EIS. NPS must not tie its own hands so that it cannot acquire land for protection and or enhancement of BBNP in the future.

14. The quotation for which you suggest revision is from the *NPS Management Policies 2001*. The general management planning team does not have the authority to change the wording of these policies.

15. According to *NPS Management Policies 2001*, lands within authorized park boundaries can be acquired or managed using methods that protect the park's resources. In lands within a park unit's authorized boundaries that have not been acquired, the National Park Service would seek, in cooperation with landowners, to provide appropriate protection measures. For example, both the inholdings near Persimmon Gap and the Pitcock Ranch are already within the approved park boundary. The park staff will attempt to acquire them should the opportunity arise.

As part of the planning process, the National Park Service is required to identify and evaluate boundary adjustments that may be necessary or desirable to carry out the purposes of the park unit. As found in *NPS Management Policies 2001*, section 3.5, boundary adjustments may be recommended to:

- Protect significant resources and values or to enhance opportunities for public enjoyment related to park purposes;
- Address operational and management issues, such as the need for access or the need for boundaries to correspond to logical boundary delineation such as topographic or other natural features or roads; or
- Otherwise protect park resources that are critical to fulfilling park purposes.

If the acquisition would be made using appropriated funds and is not merely a technical boundary revision, the criteria set forth by Congress at 16 USC 4601-9(c) (2) must be met. All recommendations for boundary changes must meet the following two criteria:

- The added lands will be feasible to administer, considering their size, configuration, and ownership, and hazardous

*Response 15 continues on next page.*



11) On page 32, **Natural Resource Management Requirements, Visitor Understanding and park Use Requirements**, NPS states that "Recreational uses will be promoted", NPS does not need to promote recreation. To have opportunities available is more than sufficient for people to have the choice whether they want to participate. The HSC is concerned that promotion of recreation may result in additional use when it is not desirable, is having unacceptable environmental impacts, or could have unacceptable environmental impacts. This is particularly important in potential Wilderness areas which are almost 600,000 of BBNP's 800,000 acres. We agree that "The park will identify implementation commitments for visitor carrying capacities for all areas of the unit." The HSC supports implementation of carrying capacities for all uses in BBNP to ensure that overuse and environmental degradation does not occur.

12) On page 35, **Natural Resource Management Requirements, Rights-of-Way and Telecommunication Infrastructure, Compliance Actions**, the HSC wholeheartedly agrees with NPS that, "The management of Big Bend National Park has determined that because of the scenic and ethnographic significance of the park's resources, there are no appropriate locations for telecommunication infrastructure in Big Bend National Park." NPS must do all it can to keep cell towers out of BBNP and away from the viewshed periphery.

#### Alternatives Including the Preferred Alternative

16.

1) On page 39, **Introduction to the Alternatives**, the HSC is very concerned that NPS has violated the requirements of the NEPA and the NEPA implementing regulations of the President's Council on Environmental Quality (CEQ). CEQ requires, in 1502.14(a), that the EIS, "Rigorously explore and objectively evaluate all reasonable alternatives." This DGMP/EIS has not done this. The "no action" alternative is a required alternative that is used for baseline comparison for other alternatives. Other than the "no action" alternative, the NPS presents only two alternatives. Alternative B, is the NPS preferred alternative.

Alternative C, in our view, can only marginally fit into the category of a "reasonable alternative" since it removes all buildings and development from the Chisos Basin and Rio Grande Village. The NPS knows, as does the HSC, that politically, this is not viewed as "reasonable."

substances, costs, the views of and impacts on local communities and surrounding jurisdictions, and other factors such as the presence of exotic species; and

- Other alternatives for management and resource protection are not adequate.

During the course of the planning process it was determined that no lands outside Big Bend National Park met the above-mentioned criteria. This finding will serve as guidance for updating the park's *Land Protection Plan*.

See the "Ideas Suggested and Eliminated from Further Consideration" section (page 75 in the draft document), which found that the lands of Christmas Mountains were "protected by a strict conservation easement, and that the easement remains in place regardless of ownership. The easement will protect the park viewshed and the Christmas Mountains from any development."

16. The National Park Service has analyzed an adequate range of alternatives.

Preliminary alternatives were distributed to agencies and the public in a newsletter in June 2001. Public comment on the newsletter is summarized on page 193. No suggestions for additional alternatives were made at that time. However, suggestions were made that some actions should be removed from the alternatives. The newsletter presented four alternatives for consideration (no action and three others). The actions below were in the preliminary alternatives, but were removed based on unacceptable environmental impacts and NPS staff reflection. Alternatives considered but eliminated from further consideration, pages 74-75 in the draft plan, discussed these and other alternatives/ actions that were considered but dismissed.

Alternative B in the newsletter proposed a relocated campground and amphitheater near Castolon in the mesquite flat or southeast along the river from the existing campground. At Castolon, it proposed relocating concessions housing out of the historic district. At Rio Grande Village the gas station

*Response 16 continues on next page.*

and store would be relocated outside the 500-year floodplain. It considered encouraging the Texas General Land Office to find a buyer for the Christmas Mountains tract who would manage it to be compatible with park purposes.

Alternative C in the newsletter would have removed all concession and NPS facilities from Chisos Basin except for the campground and two NPS residences for law enforcement and maintenance. The lodge and concession operations would be relocated to an area between Basin Junction and Panther Junction. If this were not feasible, there would be no concession lodging in the park. The campground and amphitheater near Castolon would be relocated to the mesquite flat or southeast along the river from the existing campground. The concessions housing at Castolon would be moved out of the historic district. At Rio Grande Village, campsites and certain park support facilities such as the visitor center and housing would be relocated outside the 100-year floodplain. At Rio Grande Village the gas station, store, and park support facilities such as maintenance would be relocated outside the 500-year floodplain, possibly at the junction of the road to Boquillas. Also, NPS facilities at Rio Grande Village would be reduced to five residences. Most of Rio Grande Village would be managed under the backcountry nonwilderness prescription. Concession facilities at Rio Grande Village would be reduced to two residences. Most of the land in the Harte Ranch area would be managed following the wilderness prescription. It considered encouraging the Texas General Land Office to find a buyer for the Christmas Mountains tract who would manage it to be compatible with park purposes.

Alternative D would have undertaken the same actions at Castolon as alternatives B and C. Most of the land in the Harte Ranch area would be managed following the wilderness prescription. It would enlarge the park boundary to include the Christmas Mountains and seek funds for land acquisition.

17. The HSC has been told recently that NPS is being pressured by local political officials to not allow any removal of buildings from the Chisos Basin in Alternative B and that NPS is leaning toward supporting this. This is very disturbing and is an indication that NPS is being swayed by political pressure even before the NEPA process is complete. The NEPA process was set-up specifically to avoid, as much as possible, these political pressures during the EIS process. The decision-maker needs the best, most objective, most scientifically sound, information to make his/her political decision. We request that NPS address this political pressure in the DGMP/EIS. If NPS falls prey to this political pressure there will be little to choose between Alternatives A and B. In addition, Alternative B cannot be designated as the environmentally preferred alternative.
18. At least one additional "reasonable alternative" must be considered. This alternative should lie somewhere between Alternatives B and C. This Alternative, B1, should require additional protection of water at the Chisos Basin and Rio Grande Village, including some additional removal of development in these two areas that is greater than Alternative B, but less than Alternative C.
19. None of the alternatives have different proposed Wilderness acres to provide for different levels of Wilderness protection. None of the alternatives provide for removal of the airstrip and restoration of the land that currently is dedicated to the airstrip.
20. None of the alternatives provide for removal of the airstrip and restoration of the land that currently is dedicated to the airstrip.
21. None of the alternatives provide for removal of the airstrip and restoration of the land that currently is dedicated to the airstrip.

17. The National Park Service has addressed all substantive comments received as part of the NEPA process consistent with CEQ regulations. Any substantive comments on the *Draft General Management Plan / Environmental Impact Statement* submitted by the public, agencies, and officials have been addressed in the comment and response section of this *Final General Management Plan / Environmental Impact Statement*. Any revisions to the alternatives based on public comment and/or other considerations are described in the final document.
18. Alternative B has been chosen as the environmentally preferred alternative based on criteria found in the National Environmental Policy Act, Section 101 (b), as directed by the CEQ "Forty Most Asked Questions", 6a. These criteria are listed on page 76 of the draft plan. The criteria include, among other things, consideration of visitor use and experience as well as potential resource impacts.
19. Please see our response to item 15. Some of the actions implied in the suggestion to add an alternative B1 were dismissed because of public comment. See sections on Chisos Basin and Rio Grande Village on page 74 of the draft plan.
- The National Park Service believes that it has considered the full spectrum of reasonable alternatives for Big Bend, and that no useful purpose would be served by evaluating an alternative between B and C. In fact, many commenters on the draft suggest that even alternative B is not practical or feasible from an economic standpoint.
20. Please see our response to item 7. The "Wilderness Suitability Assessment" is part of a process that is separate from the general management plan.
21. Removal of the airstrip was not considered because park staff finds it essential for park operations. The air strip is essential for park operations in terms of search-and-rescue operations, trespass livestock, and general law enforcement including drug and undocumented alien interdiction.

Response 21 continues on next page.

It appears that NPS has done its best to make Alternative B the only alternative that someone would choose. NPS describes Alternative A as causing unacceptable impacts to water resources and other natural resources. NPS description of Alternative C makes it appear "unreasonable" since it calls for the removal of almost all developed facilities in BBNP.

22. NPS neglects to include alternatives that relocate all facilities in Panther Junction outside the 500 year flood hazard area, or gradually relocates these facilities over a multi-year period, or relocates only the proposed new facilities outside the 500 year flood hazard area.
23. NPS also does not adhere to the "no action" alternative, by keeping it "status quo." For instance, NPS includes the following changes in Alternative A: the construction of two new buildings at Panther Junction, the relocation of campsites at Rio Grand Village, the raising of fuel tanks above the 500 year floodplain (page 142), and the inclusion of funds for construction, rehabilitation, and restoration of park facilities to maintain the current programs and levels of services, and upgrade of selected facilities to current health and safety standards (page 154). Therefore a true "no action" alternative has not been presented for baseline comparison to all other alternatives.

The HSC requests that the NPS revise this DGMP/EIS so it includes "all reasonable alternatives" and provides for a true "no action" alternative. Then NPS must put the revised DGMP/EIS out for public review and comment.

2) **On page 39, Introduction to the Alternatives**, the HSC does not agree with NPS that "Alternative B would safeguard the resources, scenic values, and current visitor experience of Big Bend National Park." As noted under Decision Points, the best way to protect the viewshed from within the park and the resources of the Christmas Mountains is an important question. There is no doubt that the best way to do this is via "fee acquisition" so that the federal government has total control over these lands. A conservation easement may prove to be a less durable and protective mechanism but this is the way NPS has chosen to protect these resources in this DGMP/EIS. The HSC comments in this letter document that Alternative B is not the most protective or best alternative for long-term management of BBNP resources.

Retention of the airport within the park went through a complete compliance review during which alternative locations were considered and dismissed due mainly to security concerns for the aircraft if it was outside the park.

22. Page 230 of the draft document, next to last paragraph, explains why the alternative of relocating all facilities was dismissed. That section of the document includes mitigation of the potential harmful effects of flooding.

Alternatives in the draft consider moving 15% of employee offices and residences outside the park. It is felt that this is a reasonable first step and the most that could be done during the approximately 15-year life of the plan. Many employees need to remain in the park to perform their functions.

There are more than 80 buildings at Panther Junction. Obtaining funding to relocate all of them over a period of 15 years is highly unlikely.

The "Appendix F: Statement of Findings for Floodplains for Panther Junction," page 234, does state that, "If the developed area is damaged by flooding or, as additional facilities are developed outside the park, the park staff will consider whether replacement facilities would best be sited at Panther Junction, other locations in the park, or outside the park."

23. CEQ Forty Most Asked Questions, # 3, defines no action for updating a management plan as "'no change' from current management direction or level of management intensity...continuing with the present course of action until that action is changed."

Actions that will occur with or without the implementation of an approved plan are included in the no-action alternative. For example, the park already has funding for design of the two new buildings at Panther Junction.

Whether a new plan is approved or not, the park must comply with laws, executive orders, and policies. Relocation of

Response 23 continues on next page.



24. 3) **On page 48, Panther Junction, Alternative A**, how does the NPS justify continuing to allow present use and new construction in the 500 year flood hazard zone? What kind of example does this set for the public? It is no wonder that the Federal Emergency Management Agency has to insure so many properties and buy out so many properties that are in the floodplain.
25. 4) **On page 48, Rio Grande Village and Cottonwood Campground, Alternative A**, how does NPS justify allowing the continued degradation of biological, ecological, and endangered species resources by irrigation of vegetation? NPS violates its 1916 Organic Act mandate here.
26. 5) **On page 53, Alternative A, No Action (status Quo) North Rosillos/Harte Ranch**, note the in-holdings that should be acquired to prevent incompatible development and damage to other park resources. The HSC opposes the continued use, maintenance, and any improvement of an air strip in BBNP. The NPS should provide an alternative that removes the airstrip from BBNP and restores the land that currently is dedicated to the airstrip.
27. 6) **On page 56, Backcountry Nonwilderness Prescription, Alternative B**, NPS states that "The following portions of the park have been excluded from the wilderness proposal: (1) areas along the Rio Grande and south of the River Road that are less than 5,000 acres and are impacted by citizens of Mexico and fishermen". This action is illegal and a distortion of what the Wilderness Act requires. The Wilderness Act does not arbitrarily limit Wilderness Areas to 5,000 acres. The Wilderness Act states, "has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition." It is ridiculous that the NPS will not protect lands that are of Wilderness quality near the Rio Grande, one of the most sensitive biological areas in all of BBNP, and does not address this issue of protection of potential Wilderness and illegal use and trespass in this DGMP/EIS.
- 7) **On page 56, Visitor Services Prescription, Alternative B**, the HSC supports putting electrical lines underground, removal of at least one NPS employee residence, and removal of one bunkhouse, and the removal of lodge unit A (12 rooms) from the Chisos Basin.

campsites at Rio Grande Village is needed to protect the endangered fish, Big Bend gambusia. Executive Order 11998 and NPS guidelines require that fuel tanks be raised above the level of the 500-year floodplain or protected from the 500-year flood. Likewise, "inclusion of funds for construction, rehabilitation, and restoration of park facilities to maintain current health and safety standards" are appropriate under "no change from current management direction."

24. Please see response 22.
25. At Rio Grande Village the preferred alternative would reduce irrigation by 50% and phase out plants that are heavy water users.
26. Regarding the inholdings, please see response number 15. Regarding the landing strip, please see response number 21.
27. This information comes from the approved 1984 wilderness proposal. It is not a proposal of this management plan. See responses 2b (paragraphs 4 and 7) and 2c for additional information. In a national park, *all lands* are protected to some degree or another. There are no plans for any new development of any of the land along the river south of the river road under any of the alternatives. Some of this land has been impacted over the years, particularly near the border crossings, and that is why it is not considered worthy of wilderness designation. Just because land is not recommended or designated as wilderness does not mean it is not protected. The National Park Service was protecting land for nearly 50 years before the Wilderness Act, including Big Bend National Park.

28. 8) **On page 62, Visitor Services Prescription, Alternative B**, NPs talks about having 300,000 to almost 500,000 visitors a year but says nothing about establishing carrying capacities to control the environmental impacts of this use. Carrying capacities are needed to ensure protection of proposed Wilderness areas.
29. 9) **On page 63, Visitor Services Prescription, Alternative B**, the present level of generator noise and how Alternative B will address this issue is not clear. NPS needs to state how this alternative will increase/decrease generator noise and how it will mitigate such noise.
30. 10) **On page 63, Operations Prescription, Alternative B**, the HSC opposes the continued use and maintenance of the airstrip. The airstrip should be removed and the area restored to native ecosystem conditions.
31. 11) **On page 64, Park Boundary, Alternative B**, the HSC opposes NPS's decision to ignore the need for further acquisition of park lands. The greater development that will occur in the next 20 years will make BBNP less isolated and more subject to the effects of incompatible development. NPS must not close down its option to buy important lands for protection and enhancement of BBNP.
- 12) **On page 65, Concept, Alternative C**, the HSC supports the development of lodging for visitors outside BBNP. This will reduce water use and restore the use of water in BBNP to wildlife and ecosystems.
- 13) **On page 66, Backcountry Nonwilderness Prescription, Alternative C**, see comments under 6) above.
- 14) **On page 66, Visitor Services Prescription, Alternative C**, the HSC supports putting electrical lines underground.
32. 15) **On page 72, Operations Prescription, Alternative C**, the HSC opposes the continued use and maintenance of the airstrip. The airstrip should be removed and the area restored to native ecosystem conditions.
33. 16) **On page 72, Park Boundary, Alternative C**, the HSC opposes NPS's decision to ignore the need for further acquisition of park lands. The greater development that will occur in the next 20 years will make BBNP less isolated and more subject to the effects of incompatible development. NPS must not close down its option to buy important lands for protection and enhancement of BBNP.
34. 17) **On page 74, Alternatives Eliminated from Further Consideration**, lack of public support is not a reason to remove NEPA requirements. All "reasonable" alternatives must be analyzed. CEQ has stated that reasonable is predicated on feasibility. NPS does not indicate that these alternatives are not feasible. The HSC supports the reinstatement in the DGMP/EIS of all alternatives eliminated from further consideration.
28. Please see the draft page 33, last bullet.
29. Generator noise is considered a park operational issue, and in all alternatives the park staff has and continues to enforce restrictions on noisy generators.
30. See response 21.
31. See response 15.
32. See response 21.
33. See response 15.
34. According to NPS Director's Order 12, page 51, feasibility is only one of the reasons for dismissing an alternative. Other acceptable reasons include inability to meet project objectives or resolve need; duplication with other, less environmentally damaging or less expensive alternatives; and too great an environmental impact.

35. 18) On page 75, **Ideas Suggested and Eliminated from Further Consideration**, the HSC does not support dropping the acquisition of the Christmas Mountains from the DGMP/EIS. It is a reasonable alternative and NPS must consider it in its alternatives analysis. NPS does not provide a copy of the conservation easement to demonstrate that it will be protective of the viewshed and Chihuahuan Desert ecosystem as has been stated. The public must be able to review and comment on this issue with all information provided.

19) On page 76, **The Environmentally Preferred Alternative**, the NPS falsely states that Alternative B is the environmentally preferred alternative. Alternative B will have much greater environmental impacts than Alternative C. NPS is showing that it is biased for Alternative B and is not willing to allow its environmental impacts analysis to speak for itself.

36. Shame on NPS for this distortion of the truth. Alternative C provides for visitor use that is fully complementary to Wilderness protection and protection of park resources under the Organic Act but NPS tries to state otherwise by saying that it, "reduces opportunities for all visitors to fully enjoy the park and its resources." In fact Alternative C, by having those who want to spend the night, do so outside of BBNP, ensures that the park resources are protected better than Alternative B.

37. 20) On page 77, **Mitigation and Additional Studies**, NPS is doing the public a disservice by its proposal to put additional facilities in or keep current facilities within the 100 year or 500 year floodplains. NPS should be an example and not demonstrate to the public that it is OK to build in the floodplain. By continuing this policy NPS endangers the public's money and resources and the lives of NPS personnel which would have to be replaced or rebuilt if a flood occurred and violates the Executive Order on Floodplains.

38. 21) On page 78, **Mitigation and Additional Studies**, NPS should describe the where the disputed sections of boundary are and the issues that this has raised so that the public can review and comment on this now.

22) On page 79, **Table 2: Comparison of Alternatives**, Throughout BBNP the HSC strongly supports and encourages NPS to acquire additional water rights to increase flows and water quality in the Rio Grande.

35. See response 15. The owner of the land is the Texas General Land Office. That office would be the appropriate entity to determine if it wishes to provide copies of the conservation easement to the public.

The National Park Service did indeed analyze the acquisition of the Christmas Mountains and the reasons for not pursuing acquisition are clearly spelled out in the document (see page 75 in the draft document).

36. See response 18.

37. A statement of findings for wetlands at Panther Junction is included in the draft document on pages 219-235. The planning team believes that the document, including the statement of findings, is in compliance with the NPS guidelines for implementing Executive Order 11988. If the superintendent of Big Bend National Park, the chief of the NPS Water Resources Division, and the director of the NPS Intermountain Region agree with this finding, alternative B, including the mitigation included in the statement of findings, can be implemented. (Note: A final plan / environmental impact statement, waiting period, and "Record of Decision" on the final plan / environmental impact statement are also required.)

38. The disputed sections of the boundary are all relatively minor, involve small areas of land, and are in the northwest section of the park near the North Rosillos/Harte Ranch addition as well as near Lajitas in the southwest part of the park. Park staff simply needs to resolve these disputes so that the park and its neighbors have an official, marked boundary in these areas so each can pursue his own actions without disputes about whose land one is on. We know of no other "issues raised."



23) On page 81, Table 2: Comparison of Alternatives, the HSC does not support the expansion by 40% of the RV campground in Alternative B. This type of development is very energy and monetarily intensive and creates more environmental impacts (water use) than other development.

39. 24) On page 84, Table 2: Comparison of Alternatives, Soils, the NPS has low-rated the significance of restoring 700 acres of disturbed soil to Chihuahuan Desert ecosystem in Alternative C. This beneficial environmental impact should be designated as a major, long-term, beneficial impact on vegetation and not a "moderate" impact.

40. 25) On pages 84 & 85, Table 2: Comparison of Alternatives, Wildlife & Threatened, Endangered, and Candidate Species, with its emphasis on more RV and developed campground experiences, Alternative B will have more impacts due to fragmentation. In particular road kill should be greater for Alternative B than Alternative C. This difference is not reflected in the descriptions of impacts given for Alternatives B and C.

41. 26) On page 85, Table 2: Comparison of Alternatives, Threatened, Endangered, and Candidate Species, reduction in water use and an increase in water availability for the Big Bend Gambusia should have a "major" and not "minor to moderate" long-term beneficial impact. NPS has low-rated the significance of this beneficial impact of Alternative C.

39. The National Park Service thinks that "moderate" accurately describes the impact because 700 acres is a tiny portion of the park. It may be more visible than other areas but would not have a "major, long-term, beneficial impact" on native vegetation. It would have only a local impact on those areas. However, right below that section the Park Service indicates that the impact on 638 acres at Rio Grande Village would be a major, long-term impact. The reason for the difference is that at Rio Grande Village there are many more nonnative species in greater abundance because of the effects of years of irrigation.

40. Impacts on fragmentation have been added to impacts and cumulative impacts. The National Park Service doubts that there would be an appreciable difference in the incidence of roadkill in alternative B relative to alternative A. Development and levels of traffic would stay about the same. In Alternative C, at Chisos Basin and Rio Grande Village, where most development would be removed, there could be a reduction in traffic levels resulting in fewer roadkill in these localized areas. However, traffic levels could remain the same there if reduced development simply attracted the same number of a different visitor type.

Big Bend gambusia and black capped vireo, the endangered species that might be impacted by implementing proposals in the general management plan, are not killed by automobiles. Therefore, impacts on threatened and endangered species from road kill are not described.

41. In its response to the draft document, the U.S. Fish and Wildlife Service said,

"Eliminating the groundwater pumping of Big Bend gambusia habitat at Rio Grande Village may have beneficial impacts on this species. We understand that the park is committed to developing groundwater wells that will use shallow aquifer water, eliminating the current use of the deep, geothermal source that feeds the habitat springs. Additionally, the removal of campsites near the habitat springs and restoration to natural conditions may further reduce potential impacts."

*Response 41 continues on next page.*



42. 27) On page 88, **Cultural Landscapes**, NPS over rates the impacts that Alternative C will have on these resources by saying they would have a "long-term, moderate adverse impacts on ethnographic resources."
43. **Affected Environment**
- 1) On page 99, **Natural Resources, Vegetation, North Rosillos/Harte Ranch**, how does NPS propose eliminating the exotic Johnson grass that is found in the gully systems and associated man-made diversions and water catchment structures? The elimination of Johnson grass needs to be a priority.
44. 2) On page 100, **Natural Resources, Wildlife, North Rosillos/Harte Ranch**, the need for protection of the Sierra del Carmen white-tailed deer and desert bighorn sheep emphasizes why solitude, quiet, water conservation, and wildlife protection must be emphasized in this part of BBNP. How does the DGMP/EIS recognize this need and manage for it in each alternative?
- 3) On page 101, **Natural Resources, Water Quantity**, the description of the impacts that humans currently have on the Chisos Basin and Rio Grande Village alone are enough to require that visitor and water use be reduced. The NPS needs to require this in all of its alternatives, to the maximum extent possible.
- The minimum in stream flows that are necessary to protect and restore a functioning, natural, river ecosystem must be determined and talks with Mexico initiated to ensure that this goal will be implemented and achieved in the next 20 years.
45. 4) On page 102, **Natural Resources, Threatened, Endangered, and Candidate Species**, NPS needs to remove all the threats that recreation has on the Big Bend Gambusia in Rio Grande Village. The Endangered Species Act requires this and only partial removal of these threats is unacceptable.

Note that the U.S. Fish and Wildlife Service says the actions "may" have beneficial impacts. The Park Service believes that the actions to eliminate groundwater pumping of habitat and remove campsites near the habitat pond are the more important actions in alternative C. The Park Service does not think that removing the campground and other facilities will constitute a major impact as suggested by Sierra Club. The U.S. Fish and Wildlife Service does not object to the Park Service's characterization of the effect as moderate, and using the NPS intensity definitions, moderate best represents the level of impact.

42. The comment is on a conclusion found in the "Comparison of Impacts" table (3), which is based on the "Environmental Consequences" section of the document. The analyses of ethnographic resources in "Environmental Consequences" section for alternative C provide the background and justification for this conclusion.
43. See response 2b regarding exotic species.
44. See page 47 in the draft document under the "Throughout the Park" section.

The park's resource management plan will be one of the implementation plans of the general management plan. It will describe in greater detail how wildlife populations will be managed and research needed to obtain information to better manage wildlife in the park.

The intensity definition for a major impact on wildlife, page 134 in the draft document, is "Impacts on wildlife and habitats would be obvious, long term, and would have substantial consequences on wildlife populations in the region." The Park Service does not agree that alternative C would have a major impact.

45. See response 40.

46. 5) **On page 102, Natural Resources, Floodplains**, the NPS needs to buy water rights so it can maintain minimum flows in the river. A proposal that does this should be in "all reasonable alternatives" in this DGMP/EIS.
47. 6) **On page 104, Natural Resources, Wetlands**, the NPS must inventory all wetlands in BBNP. How can NPS protect these special, sensitive, wildlife habitats if it does not know where they exist and how many acres there are? A wetlands inventory should be proposed for each "reasonable alternative" in this DGMP/EIS. The HSC supports removal of the 0.75 miles of service road, abandoned maintenance facility, powerline corridor, water reservoir access road, and water pipeline across the recovering wetlands in Rio Grande Village. The HSC also supports removal of all livestock from the riparian zone along the Rio Grande, fencing if necessary, and restoration of the riparian area with salt cedar removal and cottonwood and willow plantings.
48. 7) **On page 107, Archeological Resources**, NPS should fund an archeological survey of BBNP for the next 20 years and this survey be in each "reasonable alternative" in the DGMP/EIS.
49. 8) **On page 114, Visitor Understanding – Experiencing the Resources**, what will NPS do about the conflicts that exist between various recreational activities? What about the conflicts of camping near springs, off-road travel, and bear-human encounters? Resolution to these conflicts must be in each "reasonable alternative" in this DGMP/EIS.
50. 9) **On page 114, Visitor Understanding – Experiencing the Resources**, NPS says that visitor comments rarely mention crowding. However, carrying capacity must be established for resource protection. For instance, the use of too much water in the Chisos Basin and Rio Grande Village requires that carrying capacity limits be established. NPS must have these limits in each "reasonable alternative" in the DGMP/EIS.
51. 10) **On page 116, Visitor Understanding – Experiencing the Resources**, what does NPS mean when it says, "need to contain populations of mountain lions throughout the park." Does NPS plan to bring about the hunting or predator control of mountain lion's with this DGMP/EIS? The public has a right to know so that it can review and comment on the NPS proposal. Please explain.
52. 11) **On page 126, Texas Outdoor Recreation Plan**, the Texas Parks and Wildlife Department finalized its Texas Land and Water Conservation and Resources Plan in August or September 2002. NPS must update its information on this plan for the DGMP/EIS.
53. 12) **On pages 126-127 Christmas Mountains, Terlingua Ranch, & Lajitas**, NPS must acquire lands along the boundary to protect the viewshed and protect BBNP from incompatible land uses that development will cause. In particular the Lajitas Resort next to the boundary must be acquired to ensure that BBNP is protected.

46. The park staff will pursue the purchase of water rights, and any other legal mechanism that will leave water in the river. It will also work cooperatively with other users *to achieve its goals*. The National Park Service has a responsibility to preserve and protect the river.

47. Language to this effect has been added to "Wetlands" under "Laws, Policies, and Mandates" (draft document page 21).

48. This is called for in the draft on page 28.

49. These issues are day-to-day park management issues rather than GMP issues and are covered by NPS management policies. Bear/human interaction is not much of a problem at Big Bend because of the park staff's efforts to get ahead of the issue when the bears originally returned from Mexico. The park has had no serious encounters.

Page 116 in the draft document explains what the Park Service has done and is doing about the "infrequent incidents between humans and large mammals."

50. Please see response 28. On page 47 of the draft, it is noted that "The park has instituted a program of conservation and visitor education on the need to limit water use and the role of water in a desert environment."

51. The park does NOT propose to have hunting of mountain lions within the park. To allow hunting, new legislation would be required. The park's goal is to have mountain lions throughout the park, not eliminate them. The sentence on page 116 was deleted from the final plan.

52. The updated plan is described in the final document in the "Introduction to the Alternatives" section.

53. The Park Service considered increasing the boundary of the park and determined that such an action was not needed.

54.	<b>Environmental Consequences</b>  1) <b>On page 131, Methods for Analyzing Impacts</b> , the DGMP/EIS is deficient because it includes nothing about the needs for law enforcement. Implementing the DGMP will require a certain number of law enforcement personnel and to achieve certain goals. The DGMP/EIS has mentioned illegal actions like cattle grazing and the taking of threatened, endangered, candidate, or sensitive species, in particular cactus and herptiles. Other issues include drug smuggling, smuggling of contraband, and illegal immigrants. These actions can lead to environmental degradation. This DGMP/EIS must address the major law enforcement issues that will dominate for the next 20 years. The DGMP/EIA must provide objectives or goals that will be achieved for these law enforcement issues.
55.	2) <b>On page 132, Upstream Use of the Rio Grande</b> , the NPS describes an overused water resource but provides no recommendations about what this DGMP/EIS will do to resolve this overuse.
56.	3) <b>On page 132, Current and Future Actions</b> , the DGMP/EIS does not provide an estimate of the amount, total effects, and cumulative impacts that development will have on BBNP. Cumulative impacts assessment is required by the CEQ regulations (Section 1508.7 and 1508.8). The HSC urges the NPS to use the CEQ document, "Considering Cumulative Effects Under the National Environmental Policy Act" to develop its cumulative impacts analysis, assessment, and evaluation. Currently, this DGMP/EIS is deficient in quantifying and enumerating all past, present, and future foreseeable cumulative impacts. Therefore all alternatives do not fully disclose and take the hard look that NEPA requires.
57.	4) <b>On page 132, Impairment of Resources</b> , NPS states that, "the laws do give the NPS the management discretion to allow impacts on the resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values." However, this is precisely what is happening to BBNP's air, water quality, water quantity, riparian, and wildlife resources. NPS is ignoring these issues and is not addressing them as documented the DGMP/EIS and the comments in this letter. Impairment can occur to resources inside the park where the impact comes from outside the park. The 1916 Organic Act does not differentiate where the impacts come from, just that they must not impair the resources.

54. These are issues that law enforcement personnel at the park are already dealing with.

At the end of each alternative is a section called "Estimated Costs." The percentage increase in FTE (full-time equivalent) employees includes additional law enforcement personnel where the park has deemed them to be needed.

55. See response 3, water quantity.
56. The required cumulative analysis is included in the draft. Pages 131-32 has the cumulative impact scenario upon which the cumulative impacts for each subtopic are based (e.g., see pages 141-142 for cumulative impacts on soil for alternative A).
57. The Houston Sierra Club contends that impairment of some resources is occurring, but it does not give its reasons. It does state that the National Park Service is ignoring these issues and not addressing them in the draft. Regarding air quality, see response 2a; water quality, see response 2b; water quantity, see response 3; riparian areas, see response 2b; and for wildlife resources see the pages listed in the index under wildlife.

In the professional judgment of the superintendent, Big Bend National Park, no impacts of implementing the alternatives in the draft document would harm the integrity of the resources and values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Therefore, there would be no impairment

The Houston Sierra Club does not state its reasons for thinking that wildlife resources are being impaired. In a park of about 801,000 acres, with about 660,000 of those acres managed as wilderness, the National Park Service does not think that there is any impairment of wildlife resources.

Page 18 of the draft calls for a study to determine the impact on local aquifers "of Big Bend National Park, Big Bend

*Response 57 continues on next page.*



58. 5) **On page 133, Natural Resources**, the NPS states that, "Sensitive species also include state-listed plants and animals; however, Texas does not maintain a list of sensitive species." The Texas Parks & Wildlife Department does have a list of threatened and endangered state species which the HSC believes is a list of "sensitive species". NPS must ensure that species on the state list are protected or impacts are enumerated and mitigated.
59. 6) **On page 133, Natural Resources, Soils, Negligible**, define what "slight" means. This is an arbitrary and inconsistent term.
- 7) **On page 133, Natural Resources, Soils, Minor**, define what "small" means. This is an arbitrary and inconsistent term.
- 8) **On page 133, Natural Resources, Vegetation, Minor and Moderate**, define what "localized" means. This is an arbitrary and inconsistent term.
- 9) **On page 134, Natural Resources, Vegetation, Major**, define what "substantially" means. This is an arbitrary and inconsistent term.
- 10) **On page 134, Natural Resources, Wildlife, Minor, Moderate, and Major**, define "localized" and "substantial". These are arbitrary and inconsistent terms.
60. 11) **On page 134, Natural Resources, Water Quantity, Minor and Moderate**, it is not a minor impact if water use increases or decreases up to 25%. This value should be changed to 10%. It is not a moderate impact if water use increases or decreases 26-49%. This value should be changed to 25%.

Ranch State Park, Black Gap Wildlife Management Area, and gateway communities." This would help determine indirect impacts, if any, on wildlife from water quantity changes.

The National Park Service manages 118 miles of the Rio Grande on the park's southern boundary. The only "developed areas" along this stretch of river are Rio Grande Village and Cottonwood campground. These developments are not of a scale that causes impairment of wildlife resources.

The National Park Service has added more of its past actions and the past actions of others to the cumulative impact scenario.

58. See page 213 of the draft document for the cover letter from the state. Note that it requests that we not print the list itself. See pages 215-218 of the draft plan for the list that we compiled. In the draft plan, see page 12 for the reasons that some state species were dismissed from further consideration, and see page 19 for actions the National Park Service would take to meet legal and policy requirements related to threatened, endangered, and other special species. Some of this information was updated in the final document because additional information was received from the state.
59. Standard dictionary definitions are adequate for understanding what is meant by these terms. Impacts in a general management plan / environmental impact statement are general and conceptual. These terms are meant to assist the reader in understanding the relative intensities of the impacts.
60. The Park Service thinks that the impacts on water quantity are accurately characterized by the intensity definitions.



61. 12) **On page 134, Natural Resources, Threatened, Endangered, or Proposed Species, Minor and Moderate**, define what "localized" and "slight" means. These are arbitrary and inconsistent terms.
- 13) **On page 134, Natural Resources, Floodplains, Minor, Moderate, and Major**, define "localized", "slight", "clearly", "appreciable", "highly noticeable", and "substantial". These are arbitrary and inconsistent terms.
- 14) **On pages 134-135, Natural Resources, Wetlands, Minor, Moderate, and Major**, define "slightly detectable", "clearly detectable", "appreciable effect", "highly noticeable", and "substantial influence." The problem with these words is they are very subjective and that they can mean different things to different people and can be applied inconsistently. The NPS's entire impact assessment methodology is not quantitative and is arbitrary and capricious. The HSC objects to this subjective and inconsistent impact analysis method. These are arbitrary and inconsistent terms.
- 15) **On page 136, Archeological Resources, Minor, Moderate, and Major**, define "small area", "substantial loss of important information", and "disturbance of a site is substantial." These are arbitrary and inconsistent terms.
- 16) **On page 139, Visitor Experience, Negligible, Minor, Moderate, and Major**, define "barely detectable", "slight but detectable", "readily apparent", and "severely adverse or exceptionally beneficial". These are arbitrary and inconsistent terms.
- 17) **On pages 139-140, Socioeconomic Environment, Minor, Moderate, and Major**, define "small but measurable", "small proportion of the population", "few effects discernible", "apparent and widespread", and "readily apparent", "substantially change". These are arbitrary and inconsistent terms.
62. 18) **On page 141, Natural Resources, Soil, Alternative A**, the NPS states that soil erosion by wind and water and nutrient transport would be minor, long-term, adverse impacts. The cumulative impacts to the soil would be major and long-term since the soil has had accelerated erosion since the trail areas were first disturbed.
63. 19) **On page 143, Natural Resources, Wildlife, Alternative A**, fragmentation in the Chisos Basin is a cumulative, long-term, major impact due to the many roads and cleared areas that are found where housing is located. Vehicle traffic has increased due to the location of these structures which means more disturbance and road kill. A major deficiency in this entire DGMP/EIS is that many cumulative impacts remain unstated when impacts are covered for different types of actions in different alternatives and thus are hidden or under reported.
64. 20) **On page 144, Water Quantity, Alternative A**, there are no estimates of cumulative impacts so there is no quantification of how development will affect BBNP in the next 20 years. The NPS could look at historical trends for development and population growth and then provide a reasonable estimate of how much development and population will grow and their impacts on BBNP. It is obvious that the continued use of water in BBNP is a major, not moderate, impact. How the NPS can state that "water quantity would not be impaired as a result of implementing actions in alternative A"? This is particularly true since the impacts of water use are already significant at Chisos Basin and Rio Grande Village. The HSC objects to this dismissive attitude and requests that the NPS revise the DGMP/EIS to reflect the seriousness of the water quantity situation.

61. See response 59.

62. The statement referenced on page 141, column 1, paragraph 2, last sentence, of the draft document refers to impacts of alternative A and not to cumulative impacts. On page 142, paragraph 2, cumulative impacts have been identified as major and adverse. Language on page 142, paragraph 2, has been revised to include impacts of livestock trails in the cumulative analysis.

63. Traffic at Chisos Basin has not actually increased over the last eight years. Chisos Basin used to be the site of a major commercial horse-riding concession that corralled 50-75 horses. This was removed in the early 1990s, substantially reducing vehicular traffic in the area

In addition, at Chisos Basin, there are six employee housing units, two employee dorms, 72 lodging rooms, a 65-site campground, a restaurant, a small visitor center, and a small store. Vehicular traffic has increased as development increased over time, but speeds are low and current rates of roadkill are relatively small.

Development in the park is relatively limited and concentrated in a few small areas. Habitat fragmentation is not a major issue in this park of more than 800,000 acres.

64. The National Park Service describes cumulative impacts of implementing alternative A on water quantity at Rio Grande Village on page 144 in the draft document.

The impact analysis acknowledges adverse impacts associated with implementation of the plan alternatives. However, in the professional judgment of the superintendent, Big Bend National Park, no impacts of implementing the alternatives in the *Draft General Management Plan / Environmental Impact Statement* would result in impairment, i.e., harm the integrity of the resources and values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

65. 21) On page 145, **Big Bend Gambusia, Alternative A**, by proposing to eliminate the competition for water in Alternative A the NPS violates the definition of a "no action" alternative. The no action alternative is supposed to represent the current condition. NPS is making changes to current management so that Alternative A does not reflect what impacts are generated now. This undermines and misrepresents the baseline "no action" alternative. The HSC disagrees with NPS when it states that the lack of information regarding impacts outside the park does not make it possible to assess the relative size of impacts of Alternative A for cumulative effects. As mentioned above, the NPS can make reasonable future estimates based on past development and population growth and the impacts that these cause.
66. 22) On page 146, **Flooding, Cumulative Effects, Alternative A**, for all alternatives, the NPS does not quantify the impacts that illegal cattle and sheep grazing have had on BBNP. Therefore the NPS is not revealing all cumulative impacts.

65. Regarding the comment that alternative A is not a true "no-action" alternative, see response 23.

Quantification of cumulative impacts on water quantity is not possible for several reasons. First, data on current affects of local users on aquifers is lacking. Consequently, the National Park Service proposes to work cooperatively with local users to determine effects on local aquifers (see page 18 of the draft document). In addition, growth in Brewster County has only amounted to a 16% increase in population over the last 50 years. With a "straight line" projection, population growth over the next 20 years would result in only a 6.4% increase in Brewster County. With respect to development, past activity is not a reliable indicator of future development levels.

Efforts to increase water quantity in the river are also described in the draft document, page 18.

The National Park Service describes the cumulative impacts of implementing alternative A on water quantity at Rio Grande Village on page 144 in the draft document. The National Park Service stated that there would be no cumulative impacts on water quantity in Oak Spring because the spring originates in the Chisos Mountains within the park. The impact analysis acknowledges adverse impacts associated with implementation of plan alternatives. However, in the professional judgment of the superintendent, Big Bend National Park, no impacts of implementing the alternatives in the *Draft General Management Plan / Environmental Impact Statement* would result in impairment, i.e., harm the integrity of the resources and values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

66. In the cumulative impacts on floodplains the National Park Service has quantitatively described the impacts of cattle and sheep. The impacts of illegal cattle and sheep grazing are no different than the impacts of cattle and sheep grazing in general. Quantification of such cumulative impacts is neither necessary nor especially valuable given the basic purpose and need for the general management plan. The NPS contribution to cumulative impact under alternative A would be minimal.

67. 23) On page 147, **Flooding, Conclusion, Alternative A**, the NPS reaches an incorrect conclusion when it says that "no floodplain resources would be impacted as a result of implementing alternative A" when it has already stated that existing and future development in Panther Junction and Rio Grande Village may be severely impacted by either the 500 year or 100 year floods. NPS is underestimating the cumulative impacts that flooding will cause due to the implementation of Alternative A. The HSC objects to this illegal action.
68. 24) On pages 147-148, **Wetlands, Alternative A**, the NPS tries to minimize the impacts that illegal grazing has on riparian vegetation. It is not correct to state that "no wetland resources would be impaired as a result of implementing alternative A" when NPS has already shown that existing Alternative A conditions have degraded wetlands. The HSC objects to this illegal underestimating of cumulative impacts. NPS must designate the current impacts on wetlands as significant, since they have led to the loss of wetlands, which are scarce in the desert environment of BBNP. Wetlands are among the most important and sensitive habitats for wildlife in BBNP and deserve maximum protection and mitigation.

67. The quotation in the Sierra Club letter is not in the stated location in the draft plan. When the National Park Service states on page 147 of the draft plan that "The resources and values of Big Bend National Park would not be *impaired*" [emphasis added] as a result of implementing alternative A, it is referring to natural resources. This section is about impacts on natural resources. Buildings that might be damaged or destroyed by flooding are not natural resources and therefore do not meet any of the three criteria for impairment. In other words, natural resources would not be impaired by having buildings destroyed.
68. See responses 1 and 2b. A clause has been added to the cumulative impacts to make sure it is clear that NPS actions have contributed to cumulative impacts on wetlands. The draft document acknowledges, under impacts of alternative A, "Wetlands, cumulative impacts" that "The past impacts of agriculture, ranching, urbanization, and dam construction on wetlands covered wide areas and were major and adverse...Impacts on wetlands of current and anticipated future actions outside the park, in conjunction with the impacts of alternative A and restoration at North Rosillos/Harte Ranch, would be moderate, long-term and adverse."

In the view of the park superintendent, the damage to wetlands at Rio Grande Village (caused mostly by park visitors and NPS irrigation) do not meet the criteria stated on pages 132 and 133 in the draft plan for a determination of impairment. Degradation of resources does not necessarily mean impairment. Impairment of resources depends upon the impact intensity and its relationship to the three criteria for impairment presented in *NPS Management Policies 2001*.

The wetlands that have already been lost are not impacts of implementing the no-action alternative from plan approval forward. The purpose of the impact analysis is mainly to describe future impacts. The impacts of continuing current management of wetlands in the park would affect wetlands on one side of the river at Rio Grande Village and Cottonwood Campground for less than 1 mile. Compared to the 118 miles of river managed by the park a relatively

*Response 68 continues on next page.*



69. 25) **On page 154, Natural Resources, Alternative A**, the use of nearly all the water in the Chisos Basin from Oak Spring is not a moderate impact but is a cumulative and significant, long-term impact. The NPS underestimates the impacts that the use of water for human needs has on ecosystems and wildlife. The HSC objects to this illegal underestimating of cumulative impacts.
70. 26) **On page 156, Natural Resources, Soils, Alternative B**, NPS needs to be more precise. For Rio Grande Village and Cottonwood Campground NPS states that "some" campsites would be relocated but does not say how many, where they exist now, and where they will be relocated to.

small portion of riparian area has been damaged by visitor use, irrigation, and trespass livestock. Although the National Park Service wishes to improve the condition of all wetlands in the park, it does not agree that implementation of alternative A would have a major impact on wetlands.

The National Park Service agrees that wetlands require maximum protection and mitigation.

69. Your statement has brought to the attention of the Park Service an error in the draft document pages 147, 148 and 154. The purpose of the impact analysis is mainly to describe future impacts. The section on impacts of alternative A should describe the impacts of continuing management as at present with any foreseeable changes. Continuing current management of wetlands in the park would not use more water than is used at present. Therefore, using the definitions of intensity of impacts for water quality found on page 134 in the draft document, the impact on wetlands would be negligible rather than moderate as stated in the document or major as the Houston Sierra Club suggests.
70. It is appropriate for a general management plan to say what needs to be done without specifying how it will be done (Director's Order 2).

The campsites to be relocated at Rio Grande Village are close to the pond where Big Bend gambusia live. The campsites will be moved farther from that pond. This is stated in the draft document, for example on page 161.

The campsites to be relocated at Cottonwood Campground are near the riverbank. The bank is caving in some places.

71.	NPS also says that an interpretive trail will be constructed at Buttrill Spring and possibly at Rosillos but does not show where they will be located, how long they will be, and what impacts they will have at the site specific locations.
72.	NPS states that residences and offices would either be constructed or leased but does not say how many and where they will be located. NPS also states throughout the DGMP/EIS that new structures will be located in areas that have been previously disturbed. What NPS does not state is although the area where the new building will be constructed may have been disturbed the actual site may consist of undisturbed, native vegetation. NPS needs to show what the impacts are on these undisturbed sites of native vegetation.
73.	NPS also states that trail rehabilitation would occur but does not state where this will occur and what this consists of. The only mention of trails that the HSC finds in the DGMP/EIS deals with the construction or possible construction at Buttrill Spring and Rosillos. If other trails are to be rehabilitated then the NPS needs to list those trails, their mileage, their condition, show where on the trails rehabilitation will occur, what this rehabilitation consists of, and the impacts of the rehabilitation.
74.	Therefore the statement that the "soil resources would not be impaired by the impacts" cannot be made until all the impacts, amount of impacts, and their intensity are revealed.
75.	<b>27) On pages 158-162, Vegetation, Wildlife, Water Quantity, and Threatened, Endangered, and Candidate Species, Alternative B,</b> the use of 4 million gallons/yr at Oak Spring in the Chisos Basin is a major impact that needs to be mitigated. A 13% decrease in water use is not significant and does not fully mitigate all impacts that occur on ecosystems, vegetation, and wildlife when most of the water in Oak Spring is used for humans. NPS must provide a clear narrative and quantitative description of all cumulative impacts.

71. It is appropriate for a general management plan to say what needs to be done without specifying how it will be done, for example a trail's specific alignment (Director's Order 2). The general impacts are included under impact topics such as soils and visitor understanding.

Page 156 of the draft document states that 0.5-1 acre would be impacted by the Buttrill Springs trail.

72. See response 70. Pages 77 and 78 of the draft document list mitigation and additional studies that will be done when implementing the general management plan.
73. Trail rehabilitation is ongoing and occurs all over the park based on park assessment of need and availability of funding. According to NPS Director's Order 12, routine maintenance and repairs of trails do not require an environmental assessment or impact statement. In fact, trail maintenance work is often undertaken to reduce impacts on soils such as erosion.
74. In the view of the superintendent of the park, the impacts on soils described in the impact analysis do not meet the criteria stated on page 132 and 133 of the draft document for a determination of impairment.
75. The act establishing the National Park Service calls for the Park Service to manage for preservation and use of resources. The use of Oak Spring is illustrative of the trade-offs that the Park Service must make to comply with the act. At Chisos Basin, visitors to the park use the water from Oak Spring that would otherwise remain in associated wetlands or be used by wildlife. It is unfortunate that the spring does not produce enough water to provide for the desired human and wildlife uses at Chisos Basin. The Park Service considered the alternative of removing almost all development from the basin but determined that alternative C (which proposes removing this development) was not the preferred alternative.

The Park Service is satisfied that the cumulative impact analysis meets the requirements for this section.

76. The same is true for Rio Grande Village where 153,600,000 gallons are used/year or 471.38 acres feet of water per year. Why does NPS not quantify this massive transfer of water from ecosystem, vegetation, and wildlife purposes to human uses and report this so that the public can review and comment on this issue? These are significant impacts. It is less than honest to say that the park's vegetation, wildlife, and water quantity would not be impaired by the impacts of Alternative B when NPS has show it clearly has and will be. The HSC objects to this illegal underestimating of cumulative impacts.
77. 28) **On pages 162-164, Flooding and Wetlands, Alternative B**, the NPS underestimates cumulative impacts by stating that floodplain and wetlands would not be impaired as a result of implementing Alternative B. The NPS admits that if a 100 year and or 500 year flood occurs that many NPS facilities will be damaged or destroyed. This includes the new facilities that will be built in the floodplain in Panther Junction.
- NPS admits that already the wetlands that exist along the river and in Rio Grande Village have been negatively impacted by illegal grazing and development. NPS admits that over 471 acres feet of water will not be available for wetland purposes due to irrigation for non-native vegetation or vegetation that is not located where it can exist naturally. Yet NPS states that cumulative impacts and the impacts that Alternative B will cause will not impair park wetland and floodplain resources. The HSC objects to this illegal underestimating of cumulative impacts. NPS is biasing the NEPA process.
- 260 78. 29) **On page 165, Archeological Resources, Alternative B**, NPS makes the statement that "management prescriptions of the preferred alternative would place more than 90% of the park in either the Wilderness or Backcountry Nonwilderenss prescriptions and less than 10% of the park in management prescriptions that would allow for development." What possible use has NPS for 80,000 acres of land for future development? NPS must state why it needs an 80,000 acre set aside for potential development in the next 20 years in BBNP. If NPS does not need all of this land then NPS must place land not needed for development in more protective land categories so that development will not occur.
79. 30) **On page 168, Visitors' Experience of Park Resources, Alternative B**, the NPS does not state when peak use times are. Please tell when the water in the Chisos Basin is almost all used by humans and how long this time period lasts.

76. The Park Service does quantify this water use and make it available to the public in the draft document (page 144). The Park Service has acknowledged adverse impacts on vegetation and water quantity.

The impact analysis acknowledges adverse impacts associated with implementation of the plan alternatives. However, in the professional judgment of the superintendent, Big Bend National Park, no impacts of implementing the alternatives in the *Draft General Management Plan / Environmental Impact Statement* would result in impairment, i.e., harm the integrity of the resources and values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

77. Regarding impairment of floodplains, see response 66. Regarding impairment in general see response 76, paragraph 3.
78. Less than 10% of park land would be in management prescriptions that would allow development in any alternative. No additional development is proposed for alternative B other than the actions that are discussed in the alternative write-up. In this conceptual general management plan, it is important to show areas of potential development to do meaningful analysis. The precise acreages and location of development will be determined when the plan is implemented. However no more acreage will be developed than is absolutely necessary to accomplish the actions specified in the approved alternative. Most of the development would occur in areas that have already been disturbed.
79. Visitation statistics can be found in the draft document on pages 114-116. Other than unusual periods of extended drought, the periods when the most water is used are from mid-October through the holidays (Thanksgiving to New Years), and during the spring and early summer before the seasonal summer and early fall monsoon rains. The time period varies year to year just like the weather. In 2003 the park had 24.2 inches of rain in the Chisos Mountains. Therefore, this year, there was not any period where nearly all of the water was used from Oak Spring. Parks are natural areas and nature is dynamic; it changes.



80. 31) **On pages 168, Visitors' Experience of Park Resources, Alternative B,** NPS states that trails at Buttrill Spring and Rosillos Ranch will have long-term, beneficial and minor impacts. The NPS does not state where these trails will be, what resources will be impacted, and how long they will be. Without this information it is not possible to state that the construction of the trails will be beneficial. NPS is biasing the NEPA process.
81. 32) **On page 169, Socioeconomic Environment, Analysis, Alternative B,** NPS states that Alternative B would enhance stewardship of natural resources but does not explain how this will occur. Please do so.
82. 33) **On page 174, Soils, Alternative C,** NPS needs, for all alternatives, now, the geotechnical investigation that it says is required to mitigate before designing facilities that will be constructed. The public must be allowed to review and comment on this type of impact instead of being kept in the dark.
83. 34) **On pages 174-182, Vegetation, Wildlife, Water Quantity, Threatened, Endangered, and Candidate Species, Floodplains, and Wetlands, Alternative C,** NPS underestimates the beneficial impacts to vegetation, wildlife, etc., of ceasing to withdraw water (4 million gallons/year in Oak Spring in the Chisos Basin and 942.76 acre feet/year in Rio Grande Village) compared to Alternative A. NPS calls this a "moderate" beneficial impact for vegetation, wildlife, etc., when it should be a major or significant beneficial impact. The HSC objects to the NPS underestimating the beneficial impacts that Alternative C has.

80. See response 70.

81. Alternative B calls for more funding and additional staff to address the park's natural resource needs.

82. It is appropriate for a general management plan to say what needs to be done without specifying how it will be done, for example mitigation of impacts on soils (Director's Order 2). The general impacts are included under impact topics such as soils and visitor understanding. General mitigation for soils is listed on page 77 of the draft document. Specific mitigation needs will be determined by resource professionals on a site-by-site basis during implementation of the approved plan.

83. The beneficial impact on vegetation at Chisos Basin and Rio Grande Village was characterized as major in the draft. The Park Service thinks that the impacts on wildlife and water quantity are accurately characterized by the intensity definitions. An additional impact on wildlife from withdrawal of irrigation water was added to the final document. This impact is characterized as moderate, meaning readily detectable, long term, and localized, with consequences at the population level. The impact on water quantity at Oak Spring in alternative C was characterized as major in the draft document. The impact on water quantity at Rio Grande Village was characterized as moderate for reduction in irrigation and major for cessation of human use of spring water. The Park Service, having no information that shortage of water has been a factor in its decline, thinks it is doubtful that decreased use of the water at Oak Spring for human use would impact the Black-capped vireo. Regarding the intensity level described for Big Bend gambusia, see response 41. There would be no impact on the floodplain at Oak Spring. The beneficial impact on the floodplain at Rio Grande Village is characterized in the draft document as major. The document characterizes the impacts on wetlands at Chisos Basin and Rio Grande Village as major.

The impact on vegetation at Rio Grande Village from withdrawal of irrigation water from about 638 acres of exotic

*Response 83 continues on next page.*

84. 35) On pages 178 and 182, **Water Quantity and Wetlands, Alternative C**, NPS admits that activities outside BBNP are having and will continue to have significant impacts but then proposes nothing to reduce these impacts. The HSC objects to NPS not proposing how it will handle these issues in the DGMP/EIS.
85. 36) On page 183, **Archeological Resources, Analysis**, NPS says there are 40,000 acres available for development in BBNP due to the DGMP/EIS. What need does NPS have for 40,000 acres for future development? If there are no needs for this amount of acreage for development then NPS should place as much of this land as possible in the Wilderness or Backcountry Nonwilderness land use categories.
86. 37) On page 188, **Socioeconomic Environment, Analysis, Alternative C**, note the number of visitors do not change between Alternatives B and C.
87. **Appendixes, Bibliography, Preparers, & Index**
- 1) **Appendix B: Developing the Preferred Alternative, Comparing the Alternatives**, NPS states that because Alternative C reduces the number and types of visitor activities that it "reduces opportunities to understand the park's significance." This is untrue. Both Alternatives B and C attract the same number of visitors each year. Therefore the opportunity should be similar, although not identical, to provide "opportunities to understand the park's significance." If this is not the case then NPS must explain in detail why this is not the case. NPS's explanation must include comparing the number and types of visitor activities that each alternative will provide, contrasting their environmental impacts, and relating this to providing "opportunities to understand the park's significance." Again, the NPS is showing its bias in favor of Alternative B.

vegetation in alternative C is characterized in the draft document as major.

Irrigating less at Rio Grande Village will benefit native vegetation by reducing competition from exotic plants.

The impacts on wildlife in those areas are more accurately characterized by the statement defining moderate — readily detectable, long term, and localized, with consequences at the population level rather than the one defining major — obvious and long term and would having substantial consequences on wildlife populations in the region.

84. See responses 1 and 3, water quantity.
85. No additional development is proposed for alternative C other than the actions are discussed in the alternative write-up. In this conceptual general management plan, it is important to show areas of potential development to do meaningful analysis. The precise acreages and location of development will be determined when the approved plan is implemented. However no more acreage would be developed than is absolutely necessary to accomplish the actions specified in the alternative. Most of the development will occur in areas that contain previously disturbed soils.
86. Despite the fact that alternatives B and C contain a number of different factors, it appears that visitor figures would remain about the same. The key is that each alternative would likely attract a different type of visitor.
87. Please note that, in alternative C, both visitor contact stations at Rio Grande Village and Chisos Basin, and the two amphitheaters at those locations, would be removed. That would directly reduce visitor opportunities to understand the park's significance by severely reducing the number of interpretive programs available to visitors as well as the opportunity to ask questions of trained professional interpreters. The NPS position is better understood when this statement is placed in the context of the full sentence, which reads as follows: "Alternative C reduces the number and types of visitor activities and in so doing reduces

*Response 87 continues on next page.*

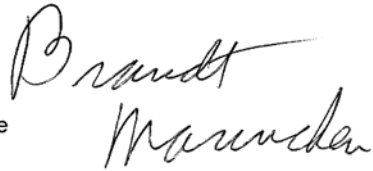
88. 2) **On page 207, Comparing the Alternatives**, NPS states that Alternative C results in the loss of some cultural landscapes and structures. However, NPS does not state that the Mission 66 structures, which are 1950-1960 era, are not considered as important as other archeological structures or landscapes.
89. 3) **On page 207, Comparing the Alternatives**, NPS states that Alternative C would provide for similar benefits as Alternative B for park operations but would be slightly less efficient. NPS does not state what this means. In fact Alternative C will be more efficient because maintenance costs will be much lower, personnel costs should be lower, and the money saved can be used to create more positions for law enforcement and resource protection.
90. 4) **On page 221, Appendix B. Interpretive Themes and Sub-themes and Visitor Understanding Goals, Visitor Understanding Goals**, one visitor understanding goal that needs to be added is to experience, enjoy, and appreciate quiet and natural sounds.

Because of the deficiencies that this letter has documented the HSC requests that the NPS revise the DGMP/EIS and put it out again for public review and comment.

The HSC appreciates this opportunity to comment on the Draft GMP & EIS for Big Bend National Park.

Sincerely,

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opportunities to understand the park's significance." Also this alternative would reduce the opportunity for some people to enjoy an overnight experience in the park. Visitation could well remain the same for each alternative, but alternative C might result in lessening the time that some visitors would spend in the park.

88. NPS policy and legal mandates require that any cultural resource that is listed on the National Register of Historic Places or considered eligible for listing on the National Register of Historic Places be provided equal treatment and consideration for Section 106 of the National Historic Preservation Act and planning purposes. Thus Mission 66 structures and landscapes must be given equal consideration along other eligible archeological features, structures, and cultural landscapes.
89. In alternative C, structures to house park maintenance, interpretive, and resource protection equipment and supplies would be removed from Rio Grande Village and Chisos Basin. This would require the park to house this equipment and material at some distance from where it would be used. The effect of this would be slightly offset by the fact that alternative C would require less maintenance of park infrastructure. Still it would make park operations less efficient.
90. The goals of experiencing solitude, experiencing the natural world, experiencing the richness of biological diversity, and seeing plants and animals in their natural setting seem to take in the same ideas as suggested.



Comments on the DRAFT General Management Plan/Environmental Impact Statement for Big Bend National Park from Betty Alex, GIS Specialist, Big Bend National Park.

These comments concern ONLY the maps in the plan.

First, the original data given to the planning team several years ago has been modified through the intervening years. Specifically the boundary file has been updated based on corrected information from the NPS Lands Office in Santa Fe. Offers to send updated data have been refused because the maps are in graphic data format rather than in ArcView/ArcInfo format and it is "too difficult to use ArcView data" to correct them. I was told that the original data sent to the team was discarded once the first maps were made. Additional errors on those first maps (other than the boundary discrepancy) have carried through each revision, even though corrections were sent in each time.

I strongly suggest that the maps be completely recreated using up-to-date data. I will send the data to the appropriate person as soon as I know where to send it.

Map showing "Region:"

1. The Presidio/Brewster County line does not go all the way to the river. Big Bend Ranch State Park obscures that line.
2. The ~ in Canon (Canon de Santa Elena) should be over the first N, not over the A.
3. Study Butte and Terlingua are distinctly separate places. The single dot and / are insulting to the people of both places. It would be like putting a single dot between Marfa and Alpine and labeling the area "Marfa/Alpine." Study Butte is on Hwy 118 south of the 118/170 junction and Terlingua is where the dot is shown on the current map.

Map showing "Park Area:"

1. The map of Texas is severely disproportionate. Use a map that actually looks like Texas.
2. The inholdings in the North Rosillos area are incorrect. This is the old data from the Lands Office that has now been corrected.
3. The area shown as "Wilderness (1984 proposed)" is incorrect. Part of that area, the utility corridors, is Potential Wilderness and should be shown as such. The Potential Wilderness presents different management problems than Proposed Wilderness.
4. The color of the river in the vicinity of Lajitas is very difficult to distinguish from the color of the Wilderness, leading to a possible misinterpretation of the boundary of the park (it looks like the boundary extends a considerable distance upstream).
5. Maverick Junction should probably be labeled "Maverick Entrance" since that is what it is currently called. Maverick Junction is an archaic term from the 1970s when there was a Ranger Station there.

Map showing "Alternative A -- No Action, Chisos Basin:"

Comments are the same for the inset park map as for "Park Area."

Map showing "Alternative A -- No Action, Panther Junction:"

1. Comments are the same for the inset park map as for "Park Area."

## Response to Betty Alex Letter

**Maps:** Concern about information and nomenclature found on some maps in the draft document.

**Response:** Comments on the maps have been considered and maps have been corrected where appropriate. As explained in the document, the maps are for illustration purposes only and are not drawn perfectly to scale; the maps are not meant to be more than conceptual.

2. Fire Management Office has not yet been built.
3. The "Natural Resources & Collection Management Building" should be labeled the "Science and Resource Management Building" and it is in the wrong place. The new building WILL NOT be built before this plan is complete, and the building houses more than just Natural Resources and Collections.

Map showing "Alternative A -- No Action, Rio Grande Village:"

Comments are the same for the inset park map as for "Park Area."

Map showing "Alternative A -- No Action, Castolon:"

1. Comments are the same for the inset park map as for "Park Area."
2. The "Pump House/Sewage Treatment" is actually "Pump House/Water Treatment." There is no Sewage Treatment plant at Castolon.

Map showing "Alternative A -- No Action, North Rosillos:"

1. Comments are the same for the inset park map as for "Park Area." On this map the inholdings are generally correct for the large map and are wrong on the inset map.
2. While the inholdings are generally correct the southeast corner of the easternmost inholding is cut off. The road into the North Rosillos just touches that southeast corner. Why is the southeast corner chopped off?
3. The Park Airstrip looks like JFK International. The size is vastly disproportionate to reality and it's not oriented correctly.

Comments on Alternative B maps:


1. Comments are the same for the inset park maps as for "Park Area."
2. Panther Junction: "New Visitor Center" is shown but old VC is still labeled "Visitor Center/Headquarters & Post Office." This should be corrected.
3. Castolon: "Pump House/Sewage Treatment" should be "Pump House/Water Treatment."
4. North Rosillos: "Adobe Structures" ARE NOT cultural! Easternmost inholding is wrong.

Comments on Alternative C maps:

These maps have most of the same errors as noted above.

One additional comment: I hope the binding for the final plan is better than for the DRAFT.

*Sally Alex*

Superintendent   
Big Bend National Park  
PO Box 129  
Big Bend National Park, Texas 79834

August 28, 2003

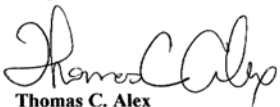
Subject: Comments on the Draft General Management Plan/Environmental Impact Statement

Attached are comments on the most recent release of the *Draft General Management Plan / Environmental Impact Statement*, Big Bend National Park, Brewster County, Texas, February, 2003. During the course of development of this document, I have submitted comments upon each release of a draft version. Many of my comments and thoughts are incorporated into subsequent versions, but several errors continue to linger in this most recent release.

Please accept these comments as my submittal not only as an "NPS insider" but also as a private citizen and concerned individual. I value planning documents that are scientifically based, comprehensive, and thoughtfully prepared. Too many times have managers ignored the documents that were the product of someone's valuable time, concern, and effort. Too many planning documents are only seen once they have been pulled off an obscure shelf and the dust blown away so one can read the long forgotten text.

I pray that this new document receives the attention that makes for a valid and useable guide to park operations.

Respectfully submitted,



Thomas C. Alex  
Box 176  
Terlingua, Texas 79852  
432-371-2917

Received

SEP 12 2003

DSC-PSD

**COMMENTS ON THE DRAFT GENERAL MANAGEMENT PLAN/  
ENVIRONMENTAL IMPACT STATEMENT**

Thomas C. Alex

August 28, 2003

My original concern about the GMP revision is this. The current GMP is notorious for being so GENERAL as to be meaningless. It has been essentially ignored since its publication. I would like the new GMP to be a useful, working document, referred to regularly. It should be a document of substance, following the spirit as well as the letter of NPS policy. It should reflect the collective wisdom gleaned from institutional memory of those who have worked here long enough to intimately understand the inherent problems and solutions peculiar to the park, rather than be a compilation of "boilerplate" prepared by people who have never actually worked in a national park. Big Bend National Park is a magnificent place that deserves the best we can give her.

**GENERAL OBSERVATION**

Throughout the document, the building at Panther Junction that houses the Science and Resource Management Division is labeled "Natural Resources and Collection Management Building." Natural and cultural *collections* are "resources" just as are the critters still running around alive, the plants still growing in the soil, and the artifacts and ruins still sitting in the backcountry. The correct name for this building is the "Science and Resource Management Building" because it houses functions including natural and cultural resources management as well as collections management.



## MAPS

Several maps have errors and inaccuracies that provide the public with the wrong information. The public needs correct and accurate information upon which to evaluate and formulate comments.

- The Park Area map (pg. 6) is incorrect. Utility corridors are shown as wilderness. These corridors are in fact only *potential* wilderness. They are *not* wilderness and should be illustrated in accordance with the currently valid wilderness map.
- The Alternative A, Panther Junction map (pg. 50) shows the Fire Management Office and Natural Resources & Collections Management Building located immediately south of the Maintenance Area. The only building currently located there is the Emergency Services Building and it is not shown. A Fire Management Office is *planned*, but does not yet exist where shown. The *Science and Resource Management & Curatorial Building* is incorrectly labeled "Natural Resources & Collections Management Building." It is also not located where shown on this map.
- The Alternative A Castolon map (pg. 52) has the Castolon Compound incorrectly labeled "Store and Cavalry Camp." The correct labeling should be "Castolon Compound."
- The Alternative A North Rosillos/ Harte Ranch map (pg. 53) has private inholdings incorrectly mapped with misaligned boundaries and in incorrect locations.
- The Alternative B, Panther Junction map (pg. 58) [ibid above] shows a Fire Management Office and Natural Resources & Collections Management Building located immediately south of the Maintenance Area. The only building currently located there is the Emergency Services Building and it is not shown. The *Science and Resource Management & Curatorial Building* is incorrectly labeled "Natural Resources & Collections Management Building." If this map is to illustrate what is planned for Panther Junction developed area, the accompanying text should accurately describe it as a proposed change and the map should be accurately labeled. If the map is to illustrate proposed future changes, then the map should be labeled in the same way that the map illustrates a "New Visitor Center" and "Add New Storage Warehouse."
- The Alternative B North Rosillos/Harte Ranch map (pg. 61) and the Alternative C North Rosillos/Harte Ranch map (pg. 71) show two adobe structures near the airstrip as "cultural." The Park Archeologist has repeatedly restated to the GMP team that these two structures have been inventoried, evaluated and determined *ineligible* for the National Register, and compliance has been completed to remove them. Yet, they still appear on the maps incorrectly identified as "cultural." These should not to be included anywhere in the plan for *interpretation or use because the park is planning to demolish them. Their presence on the map is irrelevant and they should be removed from the map.*

## Responses to Thomas Alex Letter

**Maps:** Concern about information and nomenclature found on some maps in the draft document.

**Response:** Comments on the maps have been considered, and maps have been corrected where appropriate. As explained in the document, the maps are for illustration purposes only and are not drawn perfectly to scale; the maps are not meant to be more than conceptual.

## INTERPRETIVE THEMES

### #4: Cultural resources

The Primary Interpretive Themes, #4., (pg. 8) listing cultural groups having roles in park history should read “American Indian, Spanish, Mexican and Mexican American, Anglo-American, and NPS. The Spanish period is distinct from the Mexican period. The first Europeans in this area were *Spanish* and the area was called *Nueva Viscaya*. Then, there was a war for independence from Spain, after which the area officially became *Mexico* and the citizens were *Mexican*. After the Treaty of Guadalupe Hidalgo, Mexican residents north of the Rio Grande either became US citizens or moved back to Mexico. They were either Mexican citizens or American citizens. The NPS *also* is part of the significant history of this park (e.g. Civilian Conservation Corps and Mission 66 historical periods).

## ALTERNATIVES

The plan presents alternatives (A) and (C) that are so obviously far to the extreme that no one will accept either of them. The plan is blatantly designed to place the public in a position to reject all but the preferred alternative.

The titles of Alternatives B and C speak only to “enhanced” and “adequate” natural resource stewardship with no mention of enhancing stewardship of cultural resources. Why don’t *any* of the alternatives provide for cultural resource *stewardship*?

“The general management planning process will include goals and strategies for research on, consultation about, and **stewardship** of cultural resources, and for research on and consultation with traditionally associated and other peoples.” (*NPS Management Policies 2001, Chapter 5.2 Planning*)

Shouldn’t the preferred alternative for the park be *to enhance natural and cultural resource stewardship, while providing visitors with facilities that are sustainable, thus preserving the park and providing the optimum visitor experience for future generations*? Shouldn’t the preferred alternative speak equally to both natural and cultural resource stewardship?

**Interpretive Themes:** Concern over lack of recognition of the role of the Spanish in the park area.

**Response:** A correction has been made in the text.

**Alternatives:** There was concern about the lack of stewardship for cultural resources in the alternatives.

**Response:** By law, regulations, and policy, the National Park Service is required to provide stewardship for the park's cultural resources. These cultural resource management requirements are spelled out in the "Cultural Resource Management Requirements" for archeological resources, ethnographic resources, historic buildings/structures, and collections section of the document (see pages 28-31 in the draft document). These stewardship requirements would be the same in all alternatives. Measures beyond the basic stewardship requirements are shown in the discussion of the alternatives.

## BIG BEND MANAGEMENT PRESCRIPTIONS

**Table 1, Management Prescriptions, Cultural, pg. 45**

Granted, this section deals primarily with the existing known cultural zones within the park. However, make this a proactive and dynamic plan that allows for changes to the static prescription that has been written herein. The prescription should include a statement that resource inventories will identify new sites and structures that will be added to the cultural zone.

### **Alternative B, Cultural Prescription, pg. 56**

The Park Archeologist raised the following question during previous reviews of the draft plan and EIS. Why does the Cultural Prescription focus only upon historic period resources? The whole of human history in the park encompasses *at least* the past 10,000 years. The historic period covers only the past 500 years. Specific attention is given to historic structures, but the cultural prescription under the preferred alternative contains no mention of archeological and ethnographic resources. The cultural sites inventory contains more than 1,460 prehistoric archeological sites and only 450 historic buildings, structures, and ruins. The historic period resources represent less than 5% of human history within the park.

In this section, I suggest recognizing the contribution of American Indians in the Cultural Prescription a statement:

"A parkwide cultural sites inventory will be conducted that will provide information on the prehistory of the park necessary for science-based planning for development and for resource management and interpretation."

**Big Bend Management Prescriptions:** There was concern that as inventories are completed, new sites and structures that are significant cultural resources might be identified outside the cultural prescription that has already been defined.

**Response:** Newly identified sites and structures that are significant cultural resources would be treated following NPS policies and procedures for such resources. NPS requirements for the preservation, treatment, and protection of cultural resources can be accommodated within any management prescription.

**Cultural Prescription:** There was concern that this management prescription does not recognize the important of archeological and ethnographic resources in Big Bend National Park.

**Response:** The cultural resource prescription has been modified to accommodate this concern. See the description of management prescriptions. Also the suggestion for conducting a parkwide cultural sites inventory has been incorporated into the section on "Mitigation and Additional Studies."



**AFFECTED ENVIRONMENT, Cultural Resources, Archeological Resources, pg. 107, first paragraph, fifth sentence.**

Change inaccurate text:

(Speaking of the 1966-67 Campbell survey) "...the latter survey revealed that the park probably contains sites at more than 5,000 localities. Archeological surveys conducted after 1982 have added significantly to the archeological inventory, which now contains information on over 1,500 sites. Extant data from the inventory suggest that the park contains more than 26,000 archeological sites."

**AFFECTED ENVIRONMENT, Cultural Resources, Historic Structures, pg. 108, last paragraph of section**

These are statements copied directly from my review of the *first two* drafts:

"Mention that all National Register sites or districts receive preservation maintenance and interpretation is currently done on all NR sites or districts, and would continue."

"We currently preserve and interpret ALL significant cultural properties as time and funding permit."

Change the last paragraph to simply state:

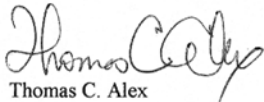
"All buildings and structures on the List of Classified Structures receive preservation treatment as staff time and funding permit."

#### SUMMATION

To make the future planning thrust of the park proactive, progressive, and more comprehensive, I propose picking and choosing from the various alternatives to create a preferred alternative stated thus:

**Enhance natural and cultural resource stewardship, while providing visitors with facilities that are sustainable, thus preserving the park and providing the optimum visitor experience for future generations**

Thank you for your time and consideration.



Thomas C. Alex

**Affected Environment, Cultural Resources, Archeological Resources:** There was concern that some of the text was inaccurate.

**Response:** Text has been corrected.

**Affected Environment, Cultural Resources, Historic Structures:** There was concern about the preservation and maintenance of historic structures.

**Response:** The text has been corrected to better describe the preservation and maintenance of the park's historic structures.

## AGENCIES AND ORGANIZATIONS TO WHICH THIS DOCUMENT WAS SENT

Note: An \* indicates that that agency or organization commented on the draft plan.

### International Agencies

International Boundary and Water Commission,  
United States and Mexico\*

### Federal Agencies

Federal Emergency Management Agency  
U.S. Army Corps of Engineers  
U.S. Department of Agriculture  
    Natural Resources Conservation Service  
    U.S. Forest Service  
U.S. Department of the Interior  
    Advisory Council on Historic Preservation  
    National Park Service  
        Amistad National Recreation Area  
        Guadalupe National Park  
        Organ Pipe Cactus National Park  
        Rivers and Trails Program  
    U.S. Fish and Wildlife Service\*  
        Ecological Field Office  
    U.S. Geological Survey  
U.S. Environmental Protection Agency\*

### Mexican State Agencies

Patricio Martinez  
Palacio de Gobierno  
Chihuahua, Chihuahua 25000  
Mexico

Rogelio Montemayor  
Palacio de Gobierno  
Saltillo, Coahuila 25000  
Mexico

### Mexican Protected Areas

Maderas del Carmen  
Julio Carrera  
Apdo. Postal 486  
Saltillo, Coahuila 2500  
Mexico

Cañon de Santa Elena  
Pablo Dominquez  
Col. San Felipe  
Chihuahua, Chihuahua 31240  
Mexico

### U.S. Senators and Representatives

Office of Senator John Cornyn  
Office of Senator Kay Bailey Hutchison  
U.S. Representative Henry Bonilla  
U.S. Representative Gene Green  
U.S. Representative Silvestre Reyes

### State Agencies

Texas Commission on Environmental Quality  
Texas Parks and Wildlife  
    Big Bend Ranch State Park  
    Black Gap Wildlife Management Area  
    Davis Mountains State Park  
    Endangered Species Branch\*  
    Wildlife Habitat Assessment Program\*  
Texas Historical Commission (state historic  
    preservation office)\*

### State Officials

Texas Governor Rick Perry  
Texas State Representative Pete Gallego  
Texas State Senator Frank Madla

### American Indian Tribes with Potential Cultural Affiliation to the Park

Fort Sill Apache Tribe of Oklahoma  
Mescalero Apache Tribe  
Apache Tribe of Oklahoma  
Blackfeet Tribe  
Caddo Indian Tribe of Oklahoma  
Cheyenne-Arapaho Tribes of Oklahoma  
Jicarilla Apache Tribe  
Kiowa Indian Tribe of Oklahoma  
Comanche Indian Tribe of Oklahoma  
Kickapoo Traditional Tribe of Texas

## CONSULTATION AND COORDINATION WITH OTHERS

### Local, City, and County Governments

Alpine, Texas, local government\*  
Amarillo, Texas, local government  
Brewster County  
    Commission\*  
    Judge, Val Beard  
    Historical Commission\*  
Brownsville, Texas, local government  
Fort Stockton, Texas, local government\*  
Pecos County Historical Commission\*  
San Vicente School District

Terrell County Commission  
    Judge Dudley Harrison

### Organizations and Businesses

*Abilene Reporter-News*  
Alpine Commerce  
*Alpine Observer*  
American Whitewater Association  
Andy White Ranches  
Associated Press  
Audubon Texas  
*Austin American-Statesman*  
Balmorhea Commerce  
Barton Warnock Center  
Big Bend Motor Inn/Mission Lodge  
Big Bend Natural History Association  
Big Bend Resorts\*  
Big Bend River Tours  
Big Spring Commerce  
*Big Spring Herald*  
*Borderline*  
Brewster County Tourism Council\*  
*Brownsville*  
*Brownwood Bulletin*  
Bullis Gap Ranch and Paradise Valley Ranch  
Center for Environmental Resource  
    Management  
Chevron USA  
Chisos Mountain Lodge  
Continental Divide Trail Society  
Conservationists' Wild River Committee  
Crane Chamber of Commerce  
*Dallas Morning News*  
Davis Mountains Trans Pecos Heritage  
    Association  
Del Rio Commerce  
*Del Rio News Herald*  
Desert Sports

*Eagle Pass News-Guide*  
*El Paso Times*  
Far Flung Adventures  
Forever Resorts, LCC  
Fort Davis Chamber of Commerce  
*Fort Stockton Commerce*  
*Fort Stockton Pioneer*  
*Fort Worth Newsletter*  
*Fort Worth Star Telegram*  
*Galveston Daily News*  
Geofactors\*  
*Houston Chronicle*  
Indian Creek Landowners Association  
Isleta del Sur Pueblo  
*Jeff Davis County Mountain Dispatch*  
Judge Roy Bean Center  
Kent State University  
KFST Radio  
KLKE and KDLK Radio  
KMID-TV Channel 2  
KVLFF Radio  
KOSA-TV  
KVLFF Radio  
KWES-News West 9  
KWES-TV  
KWMC Radio  
Lajitas Resort\*  
Lajitas Trading Post  
*Laredo Morning Times*  
*Lubbock Avalanche-Journal*  
Marathon Commerce  
Marathon Museum Society\*  
Marfa Chamber of Commerce  
Midland Commerce  
*Midland Reporter-Telegram*  
Mission Chamber of Commerce  
National Parks and Conservation Association\*  
National Park Concessions, Inc.  
Northern Arizona University  
Northwestern University  
*Odessa American*  
Odessa Convention & Visitors Bureau  
Paradise Valley  
Pecos Commerce  
*Pecos Enterprise*  
Pitcock Ranch  
Presidio Commerce  
Randolph Company  
Rio Grande Adventures  
*Rio Grande Sun*  
Riskind Natural Resources  
Rhodes Welding



*Agencies and Organizations to Which This Document Was Sent*

San Angelo Commerce	Texas Tech University
<i>San Angelo Standard-Times</i>	<i>The Alpine Avalanche</i>
<i>San Antonio Express-News</i>	<i>The Battalion</i>
Sanderson Commerce	<i>The Big Bend Sentinel</i>
<i>San Marcos Record</i>	The Conservation Fund
Sanderson River Ranch	The Conservationists' Wilderness and Wild
<i>Santa Fe New Mexican</i>	River Committee
Sierra Club	<i>The Crane News</i>
Coastal Bend*	<i>The Desert Candle Newspaper</i>
Houston Club*	The Gage Hotel
Lone Star Chapter*	<i>The International Presidio</i>
<i>Standard/Radio Post</i>	<i>The Lajitas Sun</i>
Study Butte Store	<i>The Sweetwater Reporter</i>
Sul Ross University	<i>The Van Horn Advocate</i>
<i>Terlingua Moon</i>	University of Northern Colorado
Terlingua Ranch Lodge	University of Texas-El Paso
<i>Terrell County News Leader</i>	Uvalde Commerce
Terrell Visitor	Valley Star
Texas Audubon Society	Voyageur Outward Bound
Texas Explorers Club	<i>Waco Tribune-Herald</i>
Texas Mountains Regional Tourism Council*	World Wildlife Fund
Texas River Adventures	
Texas Rivers Protection Association	